

Exhibit 5

Transcript of
Debi Stafford

September 19, 2017

Linda Liano v. Computer Sciences Corporation

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Debi Stafford

<p style="text-align: right;">1</p> <p style="text-align: center;">IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA</p> <p>LINDA LIANO, Plaintiff, vs. NO. 2:16-CV-01080-hb COMPUTER SCIENCES CORPORATION, Defendant.</p> <p>VIDEOTAPE DEPOSITION OF: DEBI STAFFORD</p> <p>DATE: September 19, 2017</p> <p>TIME: 1:58 p.m.</p> <p>LOCATION: A. William Roberts, Jr. & Associates 234 Seven Farms Drive Charleston, SC</p> <p>TAKEN BY: Counsel for the Plaintiff REPORTED BY: Janice N. Shepherd, Registered Professional Reporter</p>	<p style="text-align: right;">3</p> <p>1 VIDEOGRAPHER: Good afternoon. We are 2 now on the record. Today's date is September 19th, 3 2017, and the time on the monitor is approximately 4 1:58 p.m. This is the video deposition of Debi 5 Stafford taken by counsel for the plaintiff. The 6 location is AWR's offices at 234 Seven Farms Drive 7 in Charleston, South Carolina. My name is Clint 8 Thomas, legal videographer, representing A. 9 William Roberts, Jr. & Associates and New Jersey 10 Legal. I am familiar with the provisions of Rule 11 30(h) pertaining to videotape depositions. This 12 deposition is taken in the matter of Linda Liano 13 versus Computer Sciences Corporation, Case Number 14 2:16-CV-01080-HB. Counsel present, will you please 15 introduce yourselves for the record. 16 MR. MUNSHI: Hi, this is Rahul Munshi 17 on behalf of the plaintiff, Linda Liano. 18 MR. WOOD: Daniel Wood for Computer 19 Sciences Corporation. And I believe my colleague, 20 Joe Ward, is also dialed in by remote, I think, 21 telephone. 22 MR. WARD: That's correct, Daniel. I'm 23 on the line. 24 VIDEOGRAPHER: In accordance with Rule 25 30(h)(3), the witness has the right to be shown the</p>
<p style="text-align: right;">2</p> <p>1 APPEARANCES OF COUNSEL: 2 ATTORNEYS FOR THE PLAINTIFF 3 LINDA LIANO: 4 5 CONSOLE MATTIACCI LAW 6 BY: RAHUL MUNSHI (via VTC) 7 1525 Locust Street, 9th Floor 8 Philadelphia, PA 19102 9 (215) 545-7676 10 munshi@consolelaw.com 11 ATTORNEYS FOR THE DEFENDANT 12 COMPUTER SCIENCES CORPORATION: 13 14 THE KULLMAN FIRM 15 BY: F. DANIEL WOOD 16 600 University Park Place, Suite 340 17 Birmingham, AL 35209 18 (205) 871-5858 19 fdw@kullmanfirm.com 20 JOSEPH R. WARD, III (via phone) 21 1100 Poydras Street, #1600 22 New Orleans, LA 70163 23 (504) 524-4162 24 jrw@kullmanlaw.com 25 ALSO PRESENT: CLINT THOMAS, LEGAL VIDEOGRAPHER</p> <p>(INDEX AT REAR OF TRANSCRIPT)</p>	<p style="text-align: right;">4</p> <p>1 videotape deposition unless waived by the witness 2 and the parties. Madam Court Reporter, will you 3 please swear in the witness, and we may proceed. 4 DEBI STAFFORD, 5 being first duly sworn, was examined and testified 6 as follows: 7 MR. MUNSHI: All ready to proceed? 8 VIDEOGRAPHER: Yes. 9 EXAMINATION 10 BY MR. MUNSHI: 11 Q. Okay. Good afternoon, Ms. Stafford. 12 A. How are you? 13 Q. My name is -- good, good. My name is 14 Rahul Munshi. I'm an attorney at Console Mattiacci 15 Law up in Philadelphia, and I have the privilege of 16 representing Linda Liano in this matter that's been 17 brought against CSC. You're here today for your 18 deposition. Do you understand that? 19 A. I do. 20 Q. Have you ever had your deposition taken 21 before? 22 A. I have. 23 Q. When was the last time? 24 A. Four years ago. 25 Q. Okay. Before we get into everything,</p>

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<p style="text-align: right;">5</p> <p>1 let me go over some of the basic ground rules here.</p> <p>2 You'll probably remember it from last time.</p> <p>3 Basically I'm going to be asking you some questions</p> <p>4 here today, and you're going to give me answers to</p> <p>5 those questions. If I ask you a question that you</p> <p>6 don't understand or you want me to repeat, just let</p> <p>7 me know. I'll try to ask a better question. Okay?</p> <p>8 A. Certainly.</p> <p>9 Q. You have a court reporter sitting next</p> <p>10 to you. She's taking everything we're saying down</p> <p>11 so that a transcript can be created later. As a</p> <p>12 result, we have to be aware of a couple of things.</p> <p>13 One is that we have to make sure that we do our</p> <p>14 best to not talk over each other. Otherwise the</p> <p>15 transcript is not going to come out clean. So I'll</p> <p>16 ask you to try to wait until I'm done asking my</p> <p>17 question, even if you know where I'm going with it,</p> <p>18 and I'll try to do my best to wait until you're</p> <p>19 done answering my question until I ask the next</p> <p>20 one. Okay?</p> <p>21 A. Okay.</p> <p>22 Q. Similar instructions for the purposes</p> <p>23 of the transcript, we want to make sure we</p> <p>24 verbalize all of our answers. A head shake or head</p> <p>25 not is not going to come out clean. So from time</p>	<p style="text-align: right;">7</p> <p>1 with a CSC matter?</p> <p>2 A. Yes, it was.</p> <p>3 Q. What was the nature of that case?</p> <p>4 A. It was an employee dispute upon</p> <p>5 termination.</p> <p>6 Q. What was the name of the plaintiff in</p> <p>7 that action?</p> <p>8 A. I don't recall.</p> <p>9 Q. Do you recall if it was a man or a</p> <p>10 woman?</p> <p>11 A. No.</p> <p>12 Q. Did you understand that CSC was a</p> <p>13 defendant in that action?</p> <p>14 A. I did.</p> <p>15 Q. And was that individual somebody who</p> <p>16 was a former employee of CSC?</p> <p>17 A. Yes.</p> <p>18 Q. And did that person bring an action</p> <p>19 basically challenging the stated reasons for the</p> <p>20 termination?</p> <p>21 A. I don't recall that.</p> <p>22 Q. Okay. Did you understand that it was</p> <p>23 an employment-related matter though?</p> <p>24 A. I did.</p> <p>25 Q. Did you play any role in the decision</p>
<p style="text-align: right;">6</p> <p>1 to time I may ask you to please verbalize your</p> <p>2 actual answer. Do you understand that?</p> <p>3 A. I do.</p> <p>4 Q. If you do want to take a break at any</p> <p>5 point, just let us know. As long as there is no</p> <p>6 question pending at that time, we can go ahead and</p> <p>7 do that. All right?</p> <p>8 A. Okay.</p> <p>9 Q. And the last instruction I'll give you,</p> <p>10 Ms. Stafford, is the most important one, and that</p> <p>11 is, even though I'm in a conference room here and</p> <p>12 you're in a conference room there and there's no</p> <p>13 judge, there's no jury present, you did just take</p> <p>14 an oath here to tell the truth. And with that oath</p> <p>15 comes the same responsibilities and potential</p> <p>16 penalties of perjury if you do not tell the truth.</p> <p>17 Do you understand that?</p> <p>18 A. I do.</p> <p>19 Q. Okay. Now, you mentioned that you were</p> <p>20 deposed around four years ago; is that right?</p> <p>21 A. That's correct.</p> <p>22 Q. Okay. And were you employed by CSC at</p> <p>23 that time?</p> <p>24 A. Yes, I was.</p> <p>25 Q. And was your deposition in connection</p>	<p style="text-align: right;">8</p> <p>1 to terminate that person's employment?</p> <p>2 A. No.</p> <p>3 Q. Where was that person employed?</p> <p>4 A. I don't recall.</p> <p>5 Q. Did you personally know that person</p> <p>6 prior to their termination?</p> <p>7 A. No.</p> <p>8 Q. Did you play any role whatsoever in the</p> <p>9 decision to terminate that person's employment?</p> <p>10 A. No.</p> <p>11 Q. And do you know where that case was</p> <p>12 filed, where that lawsuit was filed?</p> <p>13 A. I do not.</p> <p>14 Q. Did you testify at trial in that case?</p> <p>15 A. No.</p> <p>16 Q. Do you know if the case did go to</p> <p>17 trial?</p> <p>18 A. I don't.</p> <p>19 Q. Do you know if the matter was resolved</p> <p>20 prior to trial?</p> <p>21 A. I don't.</p> <p>22 Q. Okay. Any other times during your</p> <p>23 employment with CSC that you were deposed as a</p> <p>24 representative of CSC?</p> <p>25 MR. WOOD: Object to the form. You can</p>

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<p style="text-align: right;">9</p> <p>1 answer.</p> <p>2 THE WITNESS: Yes.</p> <p>3 BY MR. MUNSHI:</p> <p>4 Q. How many other times?</p> <p>5 A. I don't recall exactly.</p> <p>6 Q. More than one other time?</p> <p>7 A. Yes.</p> <p>8 Q. When was the last time that you recall</p> <p>9 prior to the one you just told me about?</p> <p>10 A. I don't remember.</p> <p>11 Q. Prior -- except for the one that you</p> <p>12 already told me about, have you ever been deposed</p> <p>13 in connection with an employment-related case --</p> <p>14 A. Yes.</p> <p>15 Q. -- that was filed against CSC?</p> <p>16 A. Yes.</p> <p>17 Q. Okay. Are you aware of the name of the</p> <p>18 individual who brought the action that was the one</p> <p>19 preceding the deposition you just told me about?</p> <p>20 A. I don't recall.</p> <p>21 Q. Are you aware of any complaints,</p> <p>22 lawsuit complaints, that were brought against CSC</p> <p>23 during your tenure there where the individual</p> <p>24 claimed to be discriminated against by CSC?</p> <p>25 A. Would you ask me that again?</p>	<p style="text-align: right;">11</p> <p>1 Q. What documents have you reviewed?</p> <p>2 A. Some org charts, some Power Point</p> <p>3 presentations from the past.</p> <p>4 MR. MUNSHI: I'm sorry. We're having a</p> <p>5 little technical difficulty here. Is there a</p> <p>6 background noise on your end, or is it just on our</p> <p>7 end?</p> <p>8 THE WITNESS: The air conditioner just</p> <p>9 turned on.</p> <p>10 VIDEOGRAPHER: The air conditioner.</p> <p>11 THE WITNESS: Yeah, the air conditioner</p> <p>12 just turned on.</p> <p>13 MR. MUNSHI: Oh, okay. Can we just</p> <p>14 take a moment and see if we can fix that, because I</p> <p>15 can't hear.</p> <p>16 VIDEOGRAPHER: I can do that. Give me</p> <p>17 one moment. Let's go off the record real quick so</p> <p>18 I can do that, if you guys don't mind. We'll now</p> <p>19 go off the record. The time on the monitor is</p> <p>20 approximately 2:06 p.m.</p> <p>21 (A recess transpired.)</p> <p>22 VIDEOGRAPHER: We'll now go back on the</p> <p>23 record. The time on the monitor is now 2:07 p.m.</p> <p>24 BY MR. MUNSHI:</p> <p>25 Q. Ms. Stafford, I asked you if you had</p>
<p style="text-align: right;">10</p> <p>1 Q. Sure. Are you aware of any employment</p> <p>2 actions, lawsuits, that were brought in court where</p> <p>3 the individual claimed to be discriminated against</p> <p>4 by CSC?</p> <p>5 A. Yes.</p> <p>6 Q. Have you ever testified at trial for</p> <p>7 any of those cases?</p> <p>8 A. No.</p> <p>9 Q. Are you aware of the names of any of</p> <p>10 the individuals who brought claims that they said</p> <p>11 they were discriminated against by CSC?</p> <p>12 A. I don't remember those names.</p> <p>13 Q. Okay. You're here today because you</p> <p>14 received a subpoena for your deposition; is that</p> <p>15 correct?</p> <p>16 A. Yes.</p> <p>17 Q. And are you being represented by CSC's</p> <p>18 counsel here today?</p> <p>19 A. I am.</p> <p>20 Q. Did you personally retain him, or was</p> <p>21 it a connection through the company?</p> <p>22 A. A connection through the company.</p> <p>23 Q. Did you review any documents in</p> <p>24 preparation for your deposition today?</p> <p>25 A. Yes.</p>	<p style="text-align: right;">12</p> <p>1 reviewed any documents in preparation for your</p> <p>2 deposition. And I believe you starting answering,</p> <p>3 but I didn't hear what you said. Can you complete</p> <p>4 your answer?</p> <p>5 A. I said, yes, I did. I reviewed some</p> <p>6 Power Point presentations, some org charts. That's</p> <p>7 it.</p> <p>8 Q. Describe the Power Point presentations</p> <p>9 that you reviewed, please.</p> <p>10 A. They mostly covered our spans and</p> <p>11 layers process that we went through at CSC.</p> <p>12 Q. Were those documents documents that you</p> <p>13 had seen while you were employed at CSC during that</p> <p>14 time period?</p> <p>15 A. I can't say they all were, no.</p> <p>16 Q. Okay. And the org charts that you</p> <p>17 reviewed, were those ones that you had previously</p> <p>18 seen?</p> <p>19 A. Yes.</p> <p>20 Q. Did you create those org charts?</p> <p>21 A. No.</p> <p>22 Q. When did you first see those org</p> <p>23 charts?</p> <p>24 A. At the time they were created, so 2012,</p> <p>25 2013.</p>

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<p style="text-align: right;">13</p> <p>1 MR. MUNSHI: I have a little background</p> <p>2 noise -- okay. I can only see you, by the way. So</p> <p>3 I can't see if there are other things going on back</p> <p>4 there.</p> <p>5 BY MR. MUNSHI:</p> <p>6 Q. So the org charts that you saw were org</p> <p>7 charts that reflected the organizational structure</p> <p>8 in the 2012, 2013 area; is that right?</p> <p>9 A. Yes.</p> <p>10 Q. Do you know who did create those org</p> <p>11 charts?</p> <p>12 A. No.</p> <p>13 Q. Did you play any role in the</p> <p>14 preparation of those org charts?</p> <p>15 A. Yes.</p> <p>16 Q. What role did you play?</p> <p>17 A. I would have been working with my HR</p> <p>18 business partners on those.</p> <p>19 Q. What was the purpose of their creation?</p> <p>20 A. Can you ask me that a different way?</p> <p>21 Q. Why were those org charts created?</p> <p>22 A. To reflect the nature of the</p> <p>23 organization.</p> <p>24 Q. Were they created in connection with</p> <p>25 the reduction in force at CSC?</p>	<p style="text-align: right;">15</p> <p>1 or what I needed at the time.</p> <p>2 Q. Any specific individual that you</p> <p>3 recall?</p> <p>4 MR. WOOD: Object to the form.</p> <p>5 THE WITNESS: Well, I had a fairly</p> <p>6 large staff of business partners, so anybody that</p> <p>7 would have been on my staff.</p> <p>8 BY MR. MUNSHI:</p> <p>9 Q. Any other documents besides</p> <p>10 organizational charts and Power Point presentations</p> <p>11 that you reviewed prior to this deposition?</p> <p>12 A. No, sir.</p> <p>13 Q. When did you first learn that Ms. Liano</p> <p>14 had brought this action against CSC?</p> <p>15 A. Probably a year and a half ago.</p> <p>16 Q. Okay. And how did you learn that she</p> <p>17 had brought this action?</p> <p>18 A. I received a call from Joe.</p> <p>19 Q. Joe Ward, the attorney for CSC?</p> <p>20 A. Yes, I'm sorry.</p> <p>21 Q. That's okay. And putting aside any</p> <p>22 conversations that you had with counsel for CSC,</p> <p>23 have you communicated with anybody regarding</p> <p>24 Ms. Liano's lawsuit?</p> <p>25 A. I have not.</p>
<p style="text-align: right;">14</p> <p>1 A. Some of them may have been.</p> <p>2 Q. And what was the purpose of creating</p> <p>3 them in connection with the reduction in force?</p> <p>4 A. To reflect the organization.</p> <p>5 Q. And were they created to reflect the</p> <p>6 organization before the reduction in force, as well</p> <p>7 as what it would look like after the reduction in</p> <p>8 force?</p> <p>9 MR. WOOD: Objection to the form.</p> <p>10 THE WITNESS: Yes.</p> <p>11 BY MR. MUNSHI:</p> <p>12 Q. In any of your organizational charts</p> <p>13 that you reviewed, was Ms. Liano's name on there?</p> <p>14 A. Yes.</p> <p>15 Q. And was her name on any organizational</p> <p>16 chart that was meant to reflect the organizational</p> <p>17 structure in the year 2013?</p> <p>18 MR. WOOD: Object to the form.</p> <p>19 THE WITNESS: I don't believe so, no.</p> <p>20 BY MR. MUNSHI:</p> <p>21 Q. Okay. You mentioned HR business</p> <p>22 partners with whom you worked. Who were those</p> <p>23 individuals?</p> <p>24 A. Different people that worked for me in</p> <p>25 the organization, depending on the business units</p>	<p style="text-align: right;">16</p> <p>1 Q. Are you currently working at CSC?</p> <p>2 A. No, I'm not.</p> <p>3 Q. When did you leave CSC?</p> <p>4 A. I left voluntarily in August of 2014.</p> <p>5 Q. Are you still in communication with any</p> <p>6 of your former co-workers at CSC?</p> <p>7 A. That are still employed at CSC?</p> <p>8 Q. Or with whom you used to work at CSC.</p> <p>9 A. Yes.</p> <p>10 Q. Have you communicated with any of those</p> <p>11 individuals about Linda Liano?</p> <p>12 A. No.</p> <p>13 Q. Have you communicated with any of those</p> <p>14 individuals about the lawsuit that she brought?</p> <p>15 A. No. Could I just elaborate on that for</p> <p>16 one second?</p> <p>17 Q. Go ahead.</p> <p>18 A. My boss today worked at CSC, and so I</p> <p>19 communicated to him that I had this deposition</p> <p>20 today in order to be off today. No details, no</p> <p>21 name.</p> <p>22 Q. Okay. And who is your current boss?</p> <p>23 A. Ray August.</p> <p>24 Q. And did you work with Mr. August back</p> <p>25 when you worked at CSC?</p>

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<p style="text-align: right;">17</p> <p>1 A. I did.</p> <p>2 Q. Where do you currently work?</p> <p>3 A. Benefitfocus in Charleston, South</p> <p>4 Carolina, spelled just like it sounds.</p> <p>5 Q. Ms. Stafford, what is your date of</p> <p>6 birth?</p> <p>7 A. 7/6/55.</p> <p>8 Q. Can you walk me through your education</p> <p>9 background post high school?</p> <p>10 A. University of Texas, degree in</p> <p>11 psychology.</p> <p>12 Q. And what year did you receive that</p> <p>13 degree?</p> <p>14 A. I don't remember. I took several years</p> <p>15 off to have babies.</p> <p>16 Q. Sure. Any other graduate degrees or</p> <p>17 undergraduate degrees?</p> <p>18 A. No.</p> <p>19 Q. When did you join CSC?</p> <p>20 A. I was acquired by CSC, I think, in 1995</p> <p>21 by a company called Continuum. I was working for</p> <p>22 Continuum. They were acquired by CSC.</p> <p>23 Q. What kind of work were you doing for</p> <p>24 Continuum?</p> <p>25 A. I was a vice president of human</p>	<p style="text-align: right;">19</p> <p>1 A. Yes, I had a global staff.</p> <p>2 Q. Approximately how many people reported</p> <p>3 to you right before you left CSC?</p> <p>4 A. Fifteen.</p> <p>5 Q. Why did you leave CSC?</p> <p>6 A. I retired.</p> <p>7 Q. When did you start working for Benefit</p> <p>8 Focus?</p> <p>9 A. I started consulting with Benefit Focus</p> <p>10 in February of 2016.</p> <p>11 Q. And your retirement from CSC was</p> <p>12 voluntary?</p> <p>13 A. Yes.</p> <p>14 Q. Were you ever asked to resign?</p> <p>15 A. No.</p> <p>16 Q. Were you given a severance package in</p> <p>17 connection with your leaving CSC?</p> <p>18 A. No, I was not.</p> <p>19 Q. Do you own any shares of stock of CSC?</p> <p>20 A. No, I do not.</p> <p>21 Q. Have you ever been terminated from any</p> <p>22 job before --</p> <p>23 A. No.</p> <p>24 Q. -- involuntary? Going back to your</p> <p>25 professional background, when did you first start</p>
<p style="text-align: right;">18</p> <p>1 resources.</p> <p>2 Q. And did you work continuously for CSC</p> <p>3 from 1995 until 2014?</p> <p>4 A. No. No.</p> <p>5 Q. Walk me through --</p> <p>6 A. I took seven months off to go chase dot</p> <p>7 com riches just before the term of the year.</p> <p>8 Q. Okay. And then you came back?</p> <p>9 A. Yes.</p> <p>10 Q. You didn't strike it rich, I take it?</p> <p>11 A. I didn't. CSC made me a better offer.</p> <p>12 Q. What was your first position with CSC?</p> <p>13 A. Vice president of human resources.</p> <p>14 Q. Did your job title change at any point</p> <p>15 during your tenure at CSC?</p> <p>16 A. No.</p> <p>17 Q. In other words, when you left CSC in</p> <p>18 2014, you were still the VP of HR?</p> <p>19 A. Yes.</p> <p>20 Q. When you left CSC in 2014, who did you</p> <p>21 report directly to?</p> <p>22 A. The HR -- the HR by -- the CHRO of</p> <p>23 human resources, who was fairly new, and I cannot</p> <p>24 recall her name. Donna. Donna Lesch, L-E-S-C-H.</p> <p>25 Q. And did any individuals report to you?</p>	<p style="text-align: right;">20</p> <p>1 working in human resources in any capacity at any</p> <p>2 company?</p> <p>3 A. 1980 for Progressive Insurance.</p> <p>4 Q. And are you currently working in human</p> <p>5 resources?</p> <p>6 A. Yes.</p> <p>7 Q. Are you a member of any HR societies or</p> <p>8 organizations?</p> <p>9 A. I'm not.</p> <p>10 Q. Do you have any certificates or</p> <p>11 certifications or licenses in HR?</p> <p>12 A. No.</p> <p>13 Q. Back in 2012 at CSC, what were your</p> <p>14 general job duties as VP of HR?</p> <p>15 A. I was reporting to the leader of the</p> <p>16 global industries group, and I had general</p> <p>17 responsibilities for HR strategy, workforce</p> <p>18 planning, general employment issues, compensation.</p> <p>19 Q. What do you mean by workforce planning?</p> <p>20 A. Staffing, making sure we had proper</p> <p>21 staff for the revenue projected.</p> <p>22 Q. Where were you based out of while you</p> <p>23 were working for CSC?</p> <p>24 A. I lived in Austin, Texas. But the last</p> <p>25 three years with CSC, I was living -- commuting to</p>

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<p style="text-align: right;">21</p> <p>1 Falls Church, Virginia, every week.</p> <p>2 Q. Have you ever met Linda Liano in</p> <p>3 person?</p> <p>4 A. I don't think so, no.</p> <p>5 Q. As part of your job duties and</p> <p>6 responsibilities at CSC, did you have any</p> <p>7 responsibilities as it pertained to EEO issues,</p> <p>8 Equal Employment Opportunity issues?</p> <p>9 A. Explain it -- explain more.</p> <p>10 Q. Sure. Lots of people in HR do</p> <p>11 different things. Certain HR employees also work</p> <p>12 with EEO issues, meaning complaints about</p> <p>13 discrimination, complaints about retaliation, those</p> <p>14 types of things. Did any of those issues fall</p> <p>15 within your jurisdiction?</p> <p>16 MR. WOOD: Object to the form.</p> <p>17 THE WITNESS: Yes, they did.</p> <p>18 BY MR. MUNSHI:</p> <p>19 Q. What were your job responsibilities and</p> <p>20 duties as it pertained to the EEO issues?</p> <p>21 MR. WOOD: Object to the form. You can</p> <p>22 answer.</p> <p>23 THE WITNESS: To conduct an</p> <p>24 investigation and resolve the issues.</p> <p>25 BY MR. MUNSHI:</p>	<p style="text-align: right;">23</p> <p>1 from discrimination in the workplace?</p> <p>2 A. Yes.</p> <p>3 Q. And as an HR professional, is it your</p> <p>4 understanding that, even though we have federal and</p> <p>5 state laws that protect against discrimination,</p> <p>6 that discrimination does still exist in the</p> <p>7 workplace?</p> <p>8 MR. WOOD: Object to the form. Lack of</p> <p>9 foundation.</p> <p>10 THE WITNESS: Yes.</p> <p>11 BY MR. MUNSHI:</p> <p>12 Q. As an HR professional, are you familiar</p> <p>13 with the concept of a protected characteristic?</p> <p>14 Have you ever heard that phrase before?</p> <p>15 A. Not put that way, no.</p> <p>16 Q. Do you understand that there are</p> <p>17 federal and state laws that protect against</p> <p>18 discrimination because of somebody's age or because</p> <p>19 of somebody's sex or gender?</p> <p>20 A. Absolutely.</p> <p>21 Q. And as an HR professional, do you</p> <p>22 understand that even though those laws exist, age</p> <p>23 discrimination and sex discrimination specifically</p> <p>24 may still exist in the workplace?</p> <p>25 MR. WOOD: Object to the form.</p>
<p style="text-align: right;">22</p> <p>1 Q. Have you taken any courses or any</p> <p>2 classes or any seminars on how to recognize</p> <p>3 discrimination in the workplace?</p> <p>4 A. Yes.</p> <p>5 Q. Taken any classes or seminars on</p> <p>6 employment law or civil rights law?</p> <p>7 A. Yes.</p> <p>8 Q. In your -- and you would agree with me</p> <p>9 that you are a human resources professional;</p> <p>10 correct?</p> <p>11 A. Yes.</p> <p>12 Q. You won't be offended if I call you an</p> <p>13 HR professional?</p> <p>14 A. No.</p> <p>15 Q. Within your capacity as an HR</p> <p>16 professional, do you have any -- are you familiar</p> <p>17 with the Age Discrimination in Employment Act?</p> <p>18 A. I am.</p> <p>19 Q. And within your capacity as an HR</p> <p>20 professional, are you familiar with Title VII of</p> <p>21 the Civil Rights Act?</p> <p>22 A. I am.</p> <p>23 Q. And as an HR professional, are you</p> <p>24 familiar with the concept that we have certain</p> <p>25 federal and state laws that protect individuals</p>	<p style="text-align: right;">24</p> <p>1 THE WITNESS: Yes.</p> <p>2 BY MR. MUNSHI:</p> <p>3 Q. Do you agree with me as an HR</p> <p>4 professional that there may be people who work at</p> <p>5 CSC who may have prejudices or biases against</p> <p>6 certain individuals?</p> <p>7 MR. WOOD: Object to the form. Lack of</p> <p>8 foundation.</p> <p>9 THE WITNESS: I can't answer that.</p> <p>10 BY MR. MUNSHI:</p> <p>11 Q. Well, is it your belief that there is</p> <p>12 no individual who has ever worked at CSC who ever</p> <p>13 had a bias or a prejudice?</p> <p>14 MR. WOOD: Object to the form and lack</p> <p>15 of foundation.</p> <p>16 THE WITNESS: I can't answer that.</p> <p>17 BY MR. MUNSHI:</p> <p>18 Q. Well, my point is this. Isn't it true</p> <p>19 that as an HR professional, you're trained to</p> <p>20 understand that there are situations where people</p> <p>21 come to work with hidden biases and prejudices?</p> <p>22 MR. WOOD: Object to the form. Lack of</p> <p>23 foundation and argumentative.</p> <p>24 THE WITNESS: Yes.</p> <p>25 BY MR. MUNSHI:</p>

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<p style="text-align: right;">25</p> <p>1 Q. And is it true that CSC has policies, 2 internal policies, against discrimination? 3 A. Absolutely. 4 Q. Does CSC also have a policy that states 5 that if an individual feels like he or she is being 6 discriminated against, they are encouraged to raise 7 a complaint? 8 A. Yes, they do. 9 Q. Do you agree with me as an HR 10 professional that the reason why those policies 11 exist at CSC is because there are going to be 12 situations where a manager, where a supervisor does 13 exhibit some form of discrimination against an 14 employee? 15 MR. WOOD: Object to the form. Lack of 16 foundation and argumentative. 17 THE WITNESS: No. 18 BY MR. MUNSHI: 19 Q. Well, why do these policies exist then? 20 MR. WOOD: Object to the form. 21 Argumentative. 22 THE WITNESS: Because I think it's good 23 prudent business practice. 24 BY MR. MUNSHI: 25 Q. Why is that?</p>	<p style="text-align: right;">27</p> <p>1 Q. And how does that protect the company? 2 A. Well, I think it protects the company 3 because they're asking people to come forward and 4 tell a story about what's wrong with their 5 situation. 6 Q. Is it part of an HR person's job to 7 potentially insulate a company from liability? 8 MR. WOOD: Object to the form. 9 THE WITNESS: I don't know what you 10 mean by insulate. 11 BY MR. MUNSHI: 12 Q. Protect the company. 13 MR. WOOD: Object to the form. 14 BY MR. MUNSHI: 15 Q. Is what I mean by insulate. 16 A. Yes, I do think it's part of our job to 17 do that. 18 Q. Have you ever seen discrimination at 19 CSC before? 20 MR. WOOD: Object to the form. 21 THE WITNESS: No. 22 BY MR. MUNSHI: 23 Q. Are you aware of any managers that have 24 discriminated against an employee at CSC? 25 MR. WOOD: Object to the form.</p>
<p style="text-align: right;">26</p> <p>1 A. Because certainly these situations are 2 well-known to exist, and I think good businesses 3 put in place policies that protect them and their 4 associates. 5 Q. While the policies also exist, don't 6 you agree with me, to counter the potential biases 7 and prejudices of particular employees, that's why 8 they're there; right? 9 MR. WOOD: Object to the form and 10 argumentative. 11 THE WITNESS: I don't agree with that. 12 BY MR. MUNSHI: 13 Q. Okay. So why do the policies exist if 14 they're not meant to counter a particular forbidden 15 notion? 16 MR. WOOD: Object to form. 17 THE WITNESS: I think they're there to 18 protect both the company and the associate. 19 BY MR. MUNSHI: 20 Q. How do those policies protect the 21 company? 22 A. Well, it makes sure that if somebody 23 has a concern about the way they're being treated, 24 that they're instructed to take those concerns 25 forward.</p>	<p style="text-align: right;">28</p> <p>1 THE WITNESS: No. 2 BY MR. MUNSHI: 3 Q. In total, you worked for CSC for nearly 4 20 years. Is that right? 5 A. Twenty-four years, actually. 6 Q. Twenty-four years all in? 7 A. (Witness moves head up and down.) 8 Q. Okay. And as an HR person with the 9 company for 24 years, did you ever receive an 10 internal complaint of discrimination at CSC? 11 MR. WOOD: Object to the form. 12 THE WITNESS: Against myself? 13 BY MR. MUNSHI: 14 Q. No, receive a complaint within your 15 capacity as an HR person. 16 A. Yes. 17 Q. Approximately how many times did that 18 happen in 24 years? 19 A. Too many to count. 20 Q. More than ten? 21 A. Yes. 22 Q. More than 50? 23 A. I'm not sure, but probably. 24 Q. And was it one of your job duties and 25 responsibilities as an HR person, as the VP of HR</p>

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<p style="text-align: right;">29</p> <p>1 at CSC, to conduct investigations into those</p> <p>2 complaints that you received?</p> <p>3 MR. WOOD: Object --</p> <p>4 THE WITNESS: Yes.</p> <p>5 MR. WOOD: -- to the form.</p> <p>6 THE WITNESS: Yes.</p> <p>7 BY MR. MUNSHI:</p> <p>8 Q. Okay. And did you in fact ever conduct</p> <p>9 an investigation into a claim of an employee that</p> <p>10 he or she felt discriminated against?</p> <p>11 A. Yes.</p> <p>12 Q. Approximately how many times did you</p> <p>13 conduct such investigation?</p> <p>14 A. It would be the same answer as before.</p> <p>15 Q. When you're conducting these</p> <p>16 investigations into a complaint of discrimination,</p> <p>17 is it part of your job duties and responsibilities</p> <p>18 to ultimately reach a conclusion as to whether or</p> <p>19 not discrimination did or did not exist in that</p> <p>20 situation?</p> <p>21 A. Yes.</p> <p>22 Q. In all the investigations that you</p> <p>23 conducted during your tenure with CSC, which you</p> <p>24 estimated as may be more than 50, have you ever</p> <p>25 found that in fact there was discrimination that</p>	<p style="text-align: right;">31</p> <p>1 discrimination did in fact take place?</p> <p>2 A. I don't know that.</p> <p>3 Q. During your entire tenure at CSC, were</p> <p>4 you ever involved in any discussions or</p> <p>5 conversations about the age demographics of CSC's</p> <p>6 employees?</p> <p>7 A. Yes.</p> <p>8 MR. WOOD: Object to the form.</p> <p>9 THE WITNESS: Yes.</p> <p>10 BY MR. MUNSHI:</p> <p>11 Q. In what context would you have</p> <p>12 discussions or conversations about the age of the</p> <p>13 workforce?</p> <p>14 MR. WOOD: Object to the form.</p> <p>15 THE WITNESS: Well, there were many</p> <p>16 times that we would talk about it, depending on the</p> <p>17 circumstance. We could be talking about the entry</p> <p>18 of a new training class. We could be talking about</p> <p>19 protecting our intellectual property.</p> <p>20 BY MR. MUNSHI:</p> <p>21 Q. Any other context where the age of the</p> <p>22 workforce would come up?</p> <p>23 MR. WOOD: Object to the form. Vague.</p> <p>24 THE WITNESS: I'm not sure what you</p> <p>25 mean.</p>
<p style="text-align: right;">30</p> <p>1 took place?</p> <p>2 A. No.</p> <p>3 Q. So every single time that any</p> <p>4 individual at CSC complained to you that they felt</p> <p>5 discriminated against, you ultimately concluded</p> <p>6 that, no, that's not right. Is that correct?</p> <p>7 MR. WOOD: Object to the form and</p> <p>8 argumentative.</p> <p>9 THE WITNESS: As I just said, yes.</p> <p>10 BY MR. MUNSHI:</p> <p>11 Q. Were there any other HR folks at CSC</p> <p>12 who were similarly tasked with conducting</p> <p>13 investigations into complaints of discrimination?</p> <p>14 MR. WOOD: Object to the form. Vague.</p> <p>15 THE WITNESS: Yes.</p> <p>16 BY MR. MUNSHI:</p> <p>17 Q. Are you aware those individuals were</p> <p>18 also tasked with doing investigations and</p> <p>19 ultimately reaching a conclusion as to whether or</p> <p>20 not discrimination existed?</p> <p>21 A. I don't know that.</p> <p>22 Q. Are you aware of any other HR person at</p> <p>23 CSC during your entire 24-year tenure at the</p> <p>24 company where that person conducted an</p> <p>25 investigation and concluded that, yes,</p>	<p style="text-align: right;">32</p> <p>1 BY MR. MUNSHI:</p> <p>2 Q. Sure. Okay. So I started a couple of</p> <p>3 questions ago asking you if you were ever in or</p> <p>4 participated in any discussions or conversations</p> <p>5 where the age of the workforce was discussed. You</p> <p>6 said yes. You gave me two examples, the entry of a</p> <p>7 training class and protecting IP. My next question</p> <p>8 is simply, are there any other contexts that you</p> <p>9 recall where you were having discussions or</p> <p>10 conversations about the age of the workforce?</p> <p>11 MR. WOOD: Object to the form.</p> <p>12 THE WITNESS: Yes. There was one where</p> <p>13 we talked about the encroaching age of our</p> <p>14 retirement-eligible population and the fact that we</p> <p>15 were concerned that we needed to protect -- this is</p> <p>16 what I mean by intellectual property -- we needed</p> <p>17 to protect what they had and make sure we were able</p> <p>18 to make a suitable transition of their knowledge</p> <p>19 and skills, if and when they retired.</p> <p>20 BY MR. MUNSHI:</p> <p>21 Q. Was the word encroaching -- is that</p> <p>22 what you said, the encroaching age of the</p> <p>23 retirement population?</p> <p>24 A. I don't remember if I said that.</p> <p>25 Maybe.</p>

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<p style="text-align: right;">33</p> <p>1 Q. Were there discussions about the</p> <p>2 workforce, that a substantial portion of the</p> <p>3 workforce at CSC, maybe people who had this IP</p> <p>4 knowledge, they were about to retire or of the age</p> <p>5 of retirement?</p> <p>6 MR. WOOD: Object to the form.</p> <p>7 THE WITNESS: Not exactly. We were</p> <p>8 preparing our workforce, and it wasn't an eminent</p> <p>9 thing as much as it was workforce planning and</p> <p>10 preparation.</p> <p>11 BY MR. MUNSHI:</p> <p>12 Q. And were you having these types of</p> <p>13 conversations in the 2012 period?</p> <p>14 A. I don't recall that.</p> <p>15 Q. Well, did you have an understanding</p> <p>16 that CSC did have an aging workforce in the 2012</p> <p>17 period?</p> <p>18 MR. WOOD: Object to the form. Vague.</p> <p>19 THE WITNESS: Yes.</p> <p>20 BY MR. MUNSHI:</p> <p>21 Q. And did you ever learn or participate</p> <p>22 in any conversations about any concerns that CSC</p> <p>23 may have had about the aging workforce of the</p> <p>24 company?</p> <p>25 MR. WOOD: Object to the form and</p>	<p style="text-align: right;">35</p> <p>1 Q. You mentioned conversations regarding</p> <p>2 age in connection with the entry of a training</p> <p>3 class. What did you mean by that?</p> <p>4 MR. WOOD: Object to the form. You can</p> <p>5 answer.</p> <p>6 THE WITNESS: If we wanted to bring in</p> <p>7 people like new entrants out of college, if we</p> <p>8 wanted to do that.</p> <p>9 BY MR. MUNSHI:</p> <p>10 Q. And how did age come about during those</p> <p>11 conversations?</p> <p>12 MR. WOOD: Object to the form.</p> <p>13 THE WITNESS: We would just talk about</p> <p>14 the same workforce planning that we were bringing</p> <p>15 new people into the organization. We'd have to</p> <p>16 train them new skills, general conversations like</p> <p>17 that.</p> <p>18 BY MR. MUNSHI:</p> <p>19 Q. Were you part of any conversations</p> <p>20 about making sure that the lower ranks, be more</p> <p>21 junior employees, of CSC remained filled with</p> <p>22 younger workers?</p> <p>23 MR. WOOD: Object --</p> <p>24 THE WITNESS: No.</p> <p>25 MR. WOOD: Object to the form.</p>
<p style="text-align: right;">34</p> <p>1 vague.</p> <p>2 THE WITNESS: That's what I just</p> <p>3 answered a minute ago. So we needed to make sure</p> <p>4 that we were planning for those as they occurred.</p> <p>5 BY MR. MUNSHI:</p> <p>6 Q. Were there any decisions made or any</p> <p>7 goals that were set to be achieved? What was the</p> <p>8 resolution of those conversations?</p> <p>9 MR. WOOD: Object to the form.</p> <p>10 Compound.</p> <p>11 THE WITNESS: There was never ever</p> <p>12 planning that went on around those. It was a</p> <p>13 conversation.</p> <p>14 BY MR. MUNSHI:</p> <p>15 Q. With whom were you having these</p> <p>16 conversations?</p> <p>17 A. Generally, my leadership team.</p> <p>18 Q. And that included who?</p> <p>19 A. Jim Cook and his direct reports.</p> <p>20 Q. Who were his direct reports at that</p> <p>21 time?</p> <p>22 A. Mark Roman, Ray August, Mary Jo Morris,</p> <p>23 Eileen Sweeney. There were a couple of others, but</p> <p>24 I don't remember those. Those were the business</p> <p>25 leaders.</p>	<p style="text-align: right;">36</p> <p>1 Argumentative, vague, lack of foundation.</p> <p>2 THE WITNESS: No.</p> <p>3 BY MR. MUNSHI:</p> <p>4 Q. Ever part of any conversations about</p> <p>5 specifically bringing in younger employees into the</p> <p>6 organization?</p> <p>7 MR. WOOD: Object to the form.</p> <p>8 THE WITNESS: No.</p> <p>9 BY MR. MUNSHI:</p> <p>10 Q. Now, in your role over at CSC as the VP</p> <p>11 of HR, would you hold telephone conferences with</p> <p>12 operations managers?</p> <p>13 A. Yes.</p> <p>14 Q. Did you ever have any phone conferences</p> <p>15 with Linda Liano?</p> <p>16 A. Yes.</p> <p>17 Q. Was that a common thing or no?</p> <p>18 MR. WOOD: Object to the form.</p> <p>19 THE WITNESS: She and I had several</p> <p>20 conversations, probably several a week.</p> <p>21 BY MR. MUNSHI:</p> <p>22 Q. Just the two of you or group</p> <p>23 conversations?</p> <p>24 A. It could be both, just the two of us,</p> <p>25 and it could be group conversations.</p>

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<p style="text-align: right;">37</p> <p>1 Q. And would you routinely have group</p> <p>2 conversations with Ms. Liano and other senior</p> <p>3 operations employees at CSC?</p> <p>4 A. I'm not real familiar with that</p> <p>5 operations term. It wasn't a commonly used title</p> <p>6 for me.</p> <p>7 MR. WOOD: Object to the form then.</p> <p>8 BY MR. MUNSHI:</p> <p>9 Q. What was your understanding of what</p> <p>10 Ms. Liano's position at CSC was?</p> <p>11 A. She was in a unique position at CSC.</p> <p>12 Not unique. It's probably not well said. But she</p> <p>13 was in an unusual position. There were not many</p> <p>14 people, although some across the company, in an</p> <p>15 operations role. But that wasn't a widespread</p> <p>16 role. And when I talked to Linda, she would be the</p> <p>17 only person that had that title, or if I talked to</p> <p>18 Linda in a group. I never talked to a group of</p> <p>19 operations people -- operations managers.</p> <p>20 Q. Did you know what her exact title was</p> <p>21 at CSC?</p> <p>22 A. I probably did back then. I don't now.</p> <p>23 Q. Are you familiar with the phrase the</p> <p>24 business solutions and services group?</p> <p>25 A. Yes.</p>	<p style="text-align: right;">39</p> <p>1 foundation. You can answer.</p> <p>2 THE WITNESS: Yes.</p> <p>3 BY MR. MUNSHI:</p> <p>4 Q. What do you recall seeing, what types</p> <p>5 of representations?</p> <p>6 A. Explain that a bit more.</p> <p>7 Q. Sure. Have you ever seen any documents</p> <p>8 that show data on the ages of CSC's workforce?</p> <p>9 MR. WOOD: Object to the form. Vague.</p> <p>10 THE WITNESS: I have.</p> <p>11 BY MR. MUNSHI:</p> <p>12 Q. Okay. And what form do those documents</p> <p>13 take?</p> <p>14 A. Usually Power Point presentations.</p> <p>15 Q. And do you recall seeing such a Power</p> <p>16 Point presentation regarding the ages of employees</p> <p>17 at CSC back in the 2012 period?</p> <p>18 MR. WOOD: Object to the form.</p> <p>19 THE WITNESS: I don't recall.</p> <p>20 BY MR. MUNSHI:</p> <p>21 Q. Were you responsible for creating the</p> <p>22 Power Point presentation?</p> <p>23 A. I could have been.</p> <p>24 Q. Do you recall specifically if you did</p> <p>25 or did not create these Power Point presentations?</p>
<p style="text-align: right;">38</p> <p>1 Q. And what was that?</p> <p>2 A. That was owned by Jim Cook, and it was</p> <p>3 the four business units that I mentioned a few</p> <p>4 minutes ago. They had the intellectual property</p> <p>5 and the services part of our verticals.</p> <p>6 Q. Did you understand that Ms. Liano was</p> <p>7 within the business solutions and services group?</p> <p>8 A. It's easier to call it BSS, but yes.</p> <p>9 Q. BSS? Okay. When you would have these</p> <p>10 telephone conferences with Ms. Liano and any other</p> <p>11 CSC's employees, would you have visual</p> <p>12 representations and Power Points that would be</p> <p>13 shown to folks over the phone call?</p> <p>14 A. Possibly.</p> <p>15 Q. In the year 2012, do you recall having</p> <p>16 a phone conference where you presented data</p> <p>17 regarding the age distribution curve at CSC?</p> <p>18 MR. WOOD: Object to the form and lack</p> <p>19 of foundation. You can answer.</p> <p>20 THE WITNESS: I do not.</p> <p>21 BY MR. MUNSHI:</p> <p>22 Q. Do you recall at any point seeing a</p> <p>23 visual representation of data on the ages and the</p> <p>24 age distribution curve at CSC?</p> <p>25 MR. WOOD: Object to the form. Lack of</p>	<p style="text-align: right;">40</p> <p>1 A. Yes, I created some in the meeting that</p> <p>2 I referred to a few minutes ago.</p> <p>3 Q. And remind me, what meeting are you</p> <p>4 referring to?</p> <p>5 A. Well, as part of my job as HR vice</p> <p>6 president, I was responsible for providing a number</p> <p>7 of metrics. In that tenure, a number of things</p> <p>8 could have been provided in those Power Point</p> <p>9 presentations.</p> <p>10 Q. And one of those metrics may have</p> <p>11 included the ages of the various employees of CSC;</p> <p>12 correct?</p> <p>13 MR. WOOD: Object to the form. Lack of</p> <p>14 foundation and vague.</p> <p>15 THE WITNESS: I don't recall that</p> <p>16 specifically, no.</p> <p>17 BY MR. MUNSHI:</p> <p>18 Q. Well, did you create any Power Point</p> <p>19 presentations or other visual representations that</p> <p>20 included a metric that included age?</p> <p>21 MR. WOOD: Object to the form. Vague.</p> <p>22 THE WITNESS: Yes.</p> <p>23 BY MR. MUNSHI:</p> <p>24 Q. And what would be the purpose of</p> <p>25 creating that type of a Power Point presentation</p>

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<p style="text-align: right;">41</p> <p>1 with regard to age demographics?</p> <p>2 MR. WOOD: Object to the form.</p> <p>3 THE WITNESS: Well, it wasn't --</p> <p>4 MR. WOOD: Mischaracterizes the</p> <p>5 witness' testimony. You can answer.</p> <p>6 THE WITNESS: It wasn't solely about</p> <p>7 age. It was about our workforce, as I described a</p> <p>8 few minutes ago. It's still the same answer.</p> <p>9 BY MR. MUNSHI:</p> <p>10 Q. Okay. And I don't mean to say that the</p> <p>11 only thing that was on this document was a number</p> <p>12 on age. So age and other things that may have been</p> <p>13 part of this over all presentation.</p> <p>14 A. Yes.</p> <p>15 MR. WOOD: Object to the form.</p> <p>16 BY MR. MUNSHI:</p> <p>17 Q. I didn't ask a question yet. Would</p> <p>18 that presentation that you created that included</p> <p>19 among other things age, would that have been shared</p> <p>20 with Linda Liano?</p> <p>21 A. Not by me.</p> <p>22 Q. Ms. Liano testified in this action that</p> <p>23 she was on a telephone conference in 2012 with you</p> <p>24 where a document was shared with her via Power</p> <p>25 Point that included age metrics. Do you recall</p>	<p style="text-align: right;">43</p> <p>1 Roman?</p> <p>2 MR. WOOD: Object to the form.</p> <p>3 THE WITNESS: Yes, he would have been</p> <p>4 in those same meetings.</p> <p>5 BY MR. MUNSHI:</p> <p>6 Q. And how often would those meetings take</p> <p>7 place? Are you talking about once a year, once a</p> <p>8 week?</p> <p>9 A. Where we discussed these things?</p> <p>10 Q. Correct.</p> <p>11 A. There was no set amount of time how</p> <p>12 often we did it. It wasn't regular.</p> <p>13 Q. And do you recall any of these meetings</p> <p>14 where these things are being discussed that took</p> <p>15 place during the period of the restructuring or</p> <p>16 reduction in force at CSC in the 2012 period?</p> <p>17 A. I don't.</p> <p>18 Q. Do you still have any of these Power</p> <p>19 Point presentations that you created or saw?</p> <p>20 A. No.</p> <p>21 MR. WOOD: Object to the form.</p> <p>22 BY MR. MUNSHI:</p> <p>23 Q. Would those be documents that were</p> <p>24 saved on your work computer when you worked there?</p> <p>25 MR. WOOD: Object to the form. Lack of</p>
<p style="text-align: right;">42</p> <p>1 that phone conversation?</p> <p>2 A. I do not.</p> <p>3 MR. WOOD: Object to the form. Lack of</p> <p>4 foundation.</p> <p>5 THE WITNESS: I do not.</p> <p>6 BY MR. MUNSHI:</p> <p>7 Q. When you created these Power Point</p> <p>8 presentations, were you given any specific</p> <p>9 directive as to what to include in them?</p> <p>10 A. I was given a task to go off and get</p> <p>11 some information, and there might be guidelines</p> <p>12 that I was given in order to make sure that I was</p> <p>13 providing what they were looking to -- the</p> <p>14 information they were looking to examine.</p> <p>15 Q. And who assigned you that task?</p> <p>16 A. Usually Jim Cook or the team of the</p> <p>17 presidents.</p> <p>18 Q. Were you given any sort of directive or</p> <p>19 directions on why to include certain metrics or not</p> <p>20 to include other metrics?</p> <p>21 MR. WOOD: Object to the form. Vague.</p> <p>22 THE WITNESS: No.</p> <p>23 BY MR. MUNSHI:</p> <p>24 Q. Do you recall presenting these</p> <p>25 presentations, including age metrics, to Mark</p>	<p style="text-align: right;">44</p> <p>1 foundation.</p> <p>2 THE WITNESS: I didn't personally do</p> <p>3 them. I don't know the answer to that question.</p> <p>4 BY MR. MUNSHI:</p> <p>5 Q. Well, there was some presentations that</p> <p>6 you did personally do; correct?</p> <p>7 A. Not usually. I usually had an</p> <p>8 administrative assistant that did those.</p> <p>9 Q. Okay. You did present those though;</p> <p>10 correct?</p> <p>11 A. Yes, yes.</p> <p>12 Q. And the documents that you presented,</p> <p>13 would those be saved on your computer that you</p> <p>14 worked on when you worked at CSC?</p> <p>15 MR. WOOD: Object to the form. Asked</p> <p>16 and answered.</p> <p>17 THE WITNESS: I don't know.</p> <p>18 BY MR. MUNSHI:</p> <p>19 Q. Typically were documents, such as</p> <p>20 business plans like these at CSC, were they saved</p> <p>21 on any sort of shared network drive?</p> <p>22 MR. WOOD: Object to form.</p> <p>23 THE WITNESS: I don't know that answer.</p> <p>24 Not mine.</p> <p>25 BY MR. MUNSHI:</p>

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<p style="text-align: right;">45</p> <p>1 Q. Well, in your personal experience, 2 creating any sort of business-related document, 3 where would you save it? 4 MR. WOOD: Object to the form. Vague. 5 THE WITNESS: My administrative 6 assistant had those documents. I didn't prepare 7 them, and I didn't keep them. 8 BY MR. MUNSHI: 9 Q. Who was your administrative assistant 10 back in the 2012 period? 11 A. Gina Smith. 12 Q. Do you know if she's still employed by 13 CSC? 14 A. I do not. 15 Q. Did you ever see any data metrics or 16 any presentation which showed that the majority of 17 CSC managers were aged 50 and older? 18 MR. WOOD: Object to the form. 19 THE WITNESS: Ask me again, please. 20 BY MR. MUNSHI: 21 Q. Did you ever see any data metrics or 22 presentations that reflected managers of CSC 23 typically being aged 50 and older? 24 MR. WOOD: Object to the form. 25 THE WITNESS: Managers, no.</p>	<p style="text-align: right;">47</p> <p>1 BY MR. MUNSHI: 2 Q. Can you tell me if that's correct or 3 incorrect? 4 A. I don't remember the question. 5 Q. Okay. Can you tell me definitely 6 whether any conversation that took place that 7 brought up age demographics or age metrics did not 8 take place in 2012 as part of the reduction in 9 force? 10 MR. WOOD: Object to the form. 11 THE WITNESS: Not that I was part of. 12 BY MR. MUNSHI: 13 Q. Do you know a former employee of CSC 14 named Terri Stanton? 15 A. Yes. Not well. 16 Q. And who is she? 17 A. She, if I recall right, worked in the 18 healthcare group out of our Houston office. 19 Q. Do you recall if she had an operations 20 role or function at CSC? 21 A. I don't. 22 Q. Was she an individual who likewise you 23 would have telephone conversations with? 24 A. Not often. Not frequently. 25 Q. But you did at some point?</p>
<p style="text-align: right;">46</p> <p>1 BY MR. MUNSHI: 2 Q. Ever have a conversation with anybody 3 about management-level employees being of a certain 4 age, 50 and over? 5 MR. WOOD: Object to the form. Vague. 6 THE WITNESS: We could have talked 7 about that during those meetings I talked about. 8 BY MR. MUNSHI: 9 Q. And in connection with the 10 restructuring or reduction in force that took place 11 in 2012, did you have any conversations with 12 anybody about the aging workforce at CSC? 13 MR. WOOD: Object to the form. 14 THE WITNESS: No. 15 BY MR. MUNSHI: 16 Q. Definitely, no? 17 A. Definitely, no. 18 Q. So you know for sure there were 19 conversations where age demographics came up; but, 20 definitively, none of them took place in the year 21 2012? 22 MR. WOOD: Object to the form. That 23 mischaracterizes the witness' testimony and her 24 testimony concerning the meeting and subject matter 25 in which any age issue was discussed.</p>	<p style="text-align: right;">48</p> <p>1 A. An occasional one, yes. 2 Q. Do you recall presenting to Ms. Stanton 3 any document or presentation that showed age 4 metrics of CSC management employees? 5 A. No. 6 Q. I've made a couple of references to the 7 restructuring at CSC in 2012. Was that internally 8 referenced as the reduction in force? 9 MR. WOOD: Object to form. 10 THE WITNESS: It was internally 11 referenced as our spans and layers or delayering 12 project. 13 BY MR. MUNSHI: 14 Q. Was it ever referred to as a RIF, 15 R-I-F? 16 MR. WOOD: Object to form. 17 THE WITNESS: Not the entire project, 18 no. A RIF was an outcome of the delayering 19 process. 20 BY MR. MUNSHI: 21 Q. And during your tenure at CSC, had 22 there been any RIFs at CSC prior to 2012? 23 A. Absolutely. 24 Q. And in connection with the delayering 25 process in 2012, was there in fact a reduction of</p>

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<p style="text-align: right;">49</p> <p>1 the number of employees at CSC?</p> <p>2 A. Yes, there was.</p> <p>3 Q. When did you first learn there was</p> <p>4 going to be a delayering process taking place?</p> <p>5 A. Probably in April of 2012. Sometime</p> <p>6 between April and May.</p> <p>7 Q. Who did you learn this from?</p> <p>8 A. I think it was Gus Siekierka, who was</p> <p>9 the then CHRO of CSC.</p> <p>10 Q. What does that acronym stand for?</p> <p>11 A. Chief human resources officer.</p> <p>12 Q. Did you report directly to him during</p> <p>13 that time period?</p> <p>14 A. At points, I did; and at other points,</p> <p>15 I reported to the business leader.</p> <p>16 Q. And this delayering process at CSC, was</p> <p>17 this simply a process to reduce the number of</p> <p>18 employees of the company, or were there also going</p> <p>19 to be new employees hired by the company?</p> <p>20 MR. WOOD: Object to form and lack of</p> <p>21 foundation.</p> <p>22 THE WITNESS: Ask me again.</p> <p>23 BY MR. MUNSHI:</p> <p>24 Q. In connection with the delayering</p> <p>25 process in 2012, were there also going to be new</p>	<p style="text-align: right;">51</p> <p>1 with, who were those individuals?</p> <p>2 MR. WOOD: Object to the form.</p> <p>3 THE WITNESS: It depended on the layer</p> <p>4 we were at. But each layer would be either the L2</p> <p>5 layers, the presidents, then we went down to a</p> <p>6 division presidents, then we went down to a group</p> <p>7 of, generally speaking, vice presidents or</p> <p>8 directors. But it depended on the layer you were</p> <p>9 at, we were working on.</p> <p>10 BY MR. MUNSHI:</p> <p>11 Q. And did you work directly with Mark</p> <p>12 Roman as one of the managers?</p> <p>13 A. I did.</p> <p>14 Q. Do you recall what his title was back</p> <p>15 in the 2012 period?</p> <p>16 MR. WOOD: Object to the form. Vague.</p> <p>17 THE WITNESS: He probably started the</p> <p>18 year as a division president, and then through the</p> <p>19 delayering process, he would have become a -- I</p> <p>20 forget what the exact title was, but his title</p> <p>21 probably changed. I forget what it was.</p> <p>22 BY MR. MUNSHI:</p> <p>23 Q. Did you have an understanding that,</p> <p>24 prior to her termination, Ms. Liano reported</p> <p>25 directly to Mr. Roman?</p>
<p style="text-align: right;">50</p> <p>1 employees hired by the company?</p> <p>2 MR. WOOD: Object to the form.</p> <p>3 THE WITNESS: Potentially, there could</p> <p>4 have been.</p> <p>5 BY MR. MUNSHI:</p> <p>6 Q. Were there any new positions that were</p> <p>7 created within the organizational structure as part</p> <p>8 of the delayering process?</p> <p>9 MR. WOOD: Object to the form.</p> <p>10 THE WITNESS: I don't know that answer.</p> <p>11 BY MR. MUNSHI:</p> <p>12 Q. Did you have any specific</p> <p>13 responsibilities or duties in connection with the</p> <p>14 delayering process at CSC in 2012?</p> <p>15 A. I led it for the BSS organization.</p> <p>16 Q. And by leading it, what do you mean?</p> <p>17 Can you explain to me what your actual roles were?</p> <p>18 A. Yeah, I worked with the consulting</p> <p>19 group that we had and worked on managing each step</p> <p>20 of the delayering process by working with our group</p> <p>21 presidents and then the next layers down.</p> <p>22 Q. The consulting group is Boston</p> <p>23 Consulting Group; correct?</p> <p>24 A. That's correct.</p> <p>25 Q. And the managing level that you worked</p>	<p style="text-align: right;">52</p> <p>1 A. Yes.</p> <p>2 Q. Just looking at Mr. Roman and his</p> <p>3 business group, the individuals who reported to</p> <p>4 Mr. Roman, what role did you play in connection</p> <p>5 with the delayering process as it pertained to</p> <p>6 Mr. Roman's group?</p> <p>7 A. I managed it for the entire group that</p> <p>8 we had, and so I would have regular check-ins with</p> <p>9 Mark and his team.</p> <p>10 Q. And when you say his team, what do you</p> <p>11 mean by that?</p> <p>12 A. Well, he had to work with his next</p> <p>13 level group as the process continued to meet the</p> <p>14 objectives of the -- to meet the objectives of the</p> <p>15 process.</p> <p>16 Q. Is his next level group, the phrase</p> <p>17 that you just used, did that next level group</p> <p>18 include Ms. Liano?</p> <p>19 MR. WOOD: Object to the form.</p> <p>20 THE WITNESS: It could have.</p> <p>21 BY MR. MUNSHI:</p> <p>22 Q. Sorry. I didn't hear you.</p> <p>23 A. It could have if you were at a</p> <p>24 delayering point in the organization where they</p> <p>25 were planning the next level.</p>

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<p style="text-align: right;">53</p> <p>1 Q. Do you recall working with Ms. Liano in 2 any capacity with regard to the delayering process? 3 MR. WOOD: Object to the form. Vague. 4 THE WITNESS: No. 5 BY MR. MUNSHI: 6 Q. Were you given any directives from any 7 CSC employees or Boston Consulting Group on how to 8 facilitate this? 9 A. Yes. 10 Q. What directives were you given? 11 MR. WOOD: Object to the form. 12 VIDEOGRAPHER: We'll now go off the 13 record. The time on the monitor is 2:52 p.m. 14 (A recess transpired.) 15 VIDEOGRAPHER: We are now back on the 16 record. The time on the monitor is 2:59 p.m. 17 BY MR. MUNSHI: 18 Q. Ms. Stafford I was asking you questions 19 about your role with regard to the delayering 20 process and any directives or guidelines you may 21 have been given. Were you in fact given any 22 directives or guidelines on how to facilitate this 23 delayering process? 24 MR. WOOD: Object to the form. 25 THE WITNESS: Yes, I was.</p>	<p style="text-align: right;">55</p> <p>1 as we achieved the objectives that the organization 2 had set for us. So I -- 3 Q. And -- sorry. Go ahead. 4 A. So I would meet with those division 5 presidents, and we would discuss -- just like BCG 6 had discussed with me, I would discuss with them 7 what the various steps were. 8 Q. And was one of those individuals who 9 you spoke with Mr. Roman? 10 A. Yes. 11 Q. Did you have discussions with Mr. Roman 12 about what his organization should look like after 13 the delayering process? 14 MR. WOOD: Object to the form. 15 THE WITNESS: After the complete 16 process? 17 BY MR. MUNSHI: 18 Q. Or let me just take a step back and go 19 more broadly. What did you communicate with 20 Mr. Roman in connection with this delayering 21 process? 22 MR. WOOD: Object to the form. 23 THE WITNESS: Well, we had multiple 24 conversations about it. Each -- so we talked 25 conceptionally at first with instructions from the</p>
<p style="text-align: right;">54</p> <p>1 BY MR. MUNSHI: 2 Q. And what were they? 3 A. Well, I can't remember specifically 4 everything, but BCG had a very tight process, and 5 they took us through the process from the four-step 6 process that it was, and they were with us for 7 every one of those four steps for each layer that 8 we went. But it was my responsibility to handle it 9 with our business leaders and to give them the 10 output. 11 Q. Is the phrase business leader a title 12 that's given to any specific individuals, or is 13 that a generic term? 14 A. It's just a term. 15 Q. Was Mark Roman considered a business 16 leader? 17 A. When I just described what I did, yes. 18 Q. And did you provide Mr. Roman with any 19 directives or guidelines as to facilitating this 20 delayering process? 21 MR. WOOD: Object to the form. Vague. 22 THE WITNESS: Part of my job was to 23 take each layer that we were in and to help the 24 leader above them to go through the process of 25 looking at what the organization should look like</p>	<p style="text-align: right;">56</p> <p>1 president of the company, and then we talked about 2 each layer that we would ultimately go through. 3 BY MR. MUNSHI: 4 Q. Approximately how many layers reported 5 to Mr. Roman? 6 MR. WOOD: Object to the form. Vague 7 as to time. 8 THE WITNESS: I'm not absolutely 9 certain, but I don't think more than six. 10 BY MR. MUNSHI: 11 Q. Okay. Did you have any conversations 12 with Mr. Roman about how his organization should be 13 structured after the delayering process is 14 completed? 15 A. Well, yes, I guess I had conversations 16 with him about that. 17 Q. Did you work with Mr. Roman on creating 18 a plan for any organizational chart or hierarchy 19 that would exist after the completion of the 20 delayering process? 21 MR. WOOD: Object to the form. Vague. 22 THE WITNESS: The entire process? 23 BY MR. MUNSHI: 24 Q. Correct. 25 A. No.</p>

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<p style="text-align: right;">57</p> <p>1 Q. Did you work with Mr. Roman on creating</p> <p>2 a proposal for what his organization will look like</p> <p>3 through this layering process?</p> <p>4 MR. WOOD: Object to the form. Vague</p> <p>5 as to time.</p> <p>6 THE WITNESS: Ask me that again.</p> <p>7 BY MR. MUNSHI:</p> <p>8 Q. Sure. So looking at the period in</p> <p>9 2012, did you work with Mr. Roman on figuring out</p> <p>10 what his organization was going to look like, let's</p> <p>11 say, in 2013?</p> <p>12 MR. WOOD: Object to the form. Vague.</p> <p>13 THE WITNESS: Yes.</p> <p>14 BY MR. MUNSHI:</p> <p>15 Q. Okay. And when you're having these</p> <p>16 conversations with Mr. Roman, did you have any</p> <p>17 conversations about specifically the individuals</p> <p>18 who were reporting to Mr. Roman at that time in</p> <p>19 2012?</p> <p>20 MR. WOOD: Object to the form. Vague.</p> <p>21 THE WITNESS: Yes.</p> <p>22 BY MR. MUNSHI:</p> <p>23 Q. Did you have any conversations with</p> <p>24 Mr. Roman about Ms. Liano, who reported directly to</p> <p>25 Mr. Roman?</p>	<p style="text-align: right;">59</p> <p>1 Q. Whose decision was that?</p> <p>2 A. Mark's.</p> <p>3 Q. And when you say first pass, what do</p> <p>4 you mean by that?</p> <p>5 A. That pass then had to go to the</p> <p>6 steering committee to be approved.</p> <p>7 Q. Who was on the steering committee?</p> <p>8 A. Mike Lawrie, our president; Joe Mason,</p> <p>9 his chief of staff; and all of his direct reports,</p> <p>10 his being Mike Lawrie.</p> <p>11 Q. Did that first pass that Mr. Roman</p> <p>12 created in fact go to the steering committee?</p> <p>13 A. It did.</p> <p>14 Q. Did it go through you, or were you</p> <p>15 copied on any correspondence where it was passed to</p> <p>16 the steering committee?</p> <p>17 A. The president, Jim Cook, took it to the</p> <p>18 steering committee.</p> <p>19 Q. Do you know in what way he took it?</p> <p>20 E-mail, physically took it?</p> <p>21 A. I believe he physically carried in</p> <p>22 Power Point presentations.</p> <p>23 Q. Did you see those Power Point</p> <p>24 presentations?</p> <p>25 A. That he took in?</p>
<p style="text-align: right;">58</p> <p>1 A. Yes.</p> <p>2 Q. And what do you recall about those</p> <p>3 conversations?</p> <p>4 A. Well, first, you have to step back.</p> <p>5 There was an entire process that occurred. We</p> <p>6 first had to design the organization. Then it had</p> <p>7 to be approved. Then we had to staff the</p> <p>8 organization. So throughout the course of that,</p> <p>9 depending on where we were in the process, we would</p> <p>10 have had different conversations, either about the</p> <p>11 organization --</p> <p>12 Q. Go ahead, sorry.</p> <p>13 A. Either about the organization or,</p> <p>14 subsequently, about the approved organization.</p> <p>15 Q. Okay. So let's start with the first</p> <p>16 one, which is designing the organization. Did you</p> <p>17 have conversations with Mr. Roman about designing</p> <p>18 the organization?</p> <p>19 A. I did.</p> <p>20 Q. And in your conversations with</p> <p>21 Mr. Roman, did you ever discuss what role, if any,</p> <p>22 Ms. Liano would play in this designed organization?</p> <p>23 A. In Mark's first pass at his</p> <p>24 organization, Linda was on the organizational</p> <p>25 chart.</p>	<p style="text-align: right;">60</p> <p>1 Q. Correct.</p> <p>2 A. Yes.</p> <p>3 Q. And what was included in those Power</p> <p>4 Point presentations?</p> <p>5 MR. WOOD: Object to the form.</p> <p>6 THE WITNESS: The organization that</p> <p>7 Mark Roman was recommending that he keep.</p> <p>8 BY MR. MUNSHI:</p> <p>9 Q. Did you have any discussions with</p> <p>10 Mr. Roman about his first pass that included</p> <p>11 specifically keeping Ms. Liano?</p> <p>12 A. We didn't talk specifically about</p> <p>13 Linda. He just had her on the org chart in her</p> <p>14 same position.</p> <p>15 Q. Were you a member of the steering</p> <p>16 committee?</p> <p>17 A. No.</p> <p>18 Q. Did you participate in any</p> <p>19 conversations with the steering committee about</p> <p>20 Mr. Roman's organizational charts?</p> <p>21 A. No.</p> <p>22 MR. WOOD: Object to the form.</p> <p>23 BY MR. MUNSHI:</p> <p>24 Q. After it was presented to the steering</p> <p>25 committee, what happened next?</p>

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<p style="text-align: right;">61</p> <p>1 A. Jim Cook would bring it back to the</p> <p>2 individual presidents. They would discuss the</p> <p>3 outcomes.</p> <p>4 Q. Did Mr. Cook have a conversation with</p> <p>5 Mr. Roman about his what you called first pass?</p> <p>6 A. I don't know. I'm assuming.</p> <p>7 Q. Are you aware of any e-mails that were</p> <p>8 going back and forth between Mr. Roman and Mr. Cook</p> <p>9 about Mr. Roman's org chart?</p> <p>10 A. No.</p> <p>11 Q. Did Mr. Cook then present Mr. Roman</p> <p>12 with a revised chart?</p> <p>13 MR. WOOD: Object to the form.</p> <p>14 THE WITNESS: Did Mr. Cook present to</p> <p>15 Mr. Roman a revised chart? I don't know that</p> <p>16 answer.</p> <p>17 BY MR. MUNSHI:</p> <p>18 Q. Do you know what happened with</p> <p>19 Mr. Roman's first pass, what happened to that</p> <p>20 chart?</p> <p>21 MR. WOOD: Object to the form.</p> <p>22 THE WITNESS: It was significantly</p> <p>23 changed.</p> <p>24 BY MR. MUNSHI:</p> <p>25 Q. Did you play any role in any decisions</p>	<p style="text-align: right;">63</p> <p>1 THE WITNESS: Did you say targeted</p> <p>2 individuals?</p> <p>3 BY MR. MUNSHI:</p> <p>4 Q. Or roles, yes.</p> <p>5 MR. WOOD: Object to the form. Vague.</p> <p>6 THE WITNESS: Roles, yes. Targeted</p> <p>7 individuals, no.</p> <p>8 BY MR. MUNSHI:</p> <p>9 Q. Were there targeted roles?</p> <p>10 A. As we went through the process, there</p> <p>11 were.</p> <p>12 Q. What were the targeted roles?</p> <p>13 A. Well, it depended on the organization</p> <p>14 you were at and what layer you were at. There were</p> <p>15 multiple.</p> <p>16 Q. Were you ever given a general directive</p> <p>17 that senior operations management positions were</p> <p>18 going to be eliminated?</p> <p>19 MR. WOOD: Object to the form.</p> <p>20 THE WITNESS: It was an outcome of the</p> <p>21 org chart, so yes.</p> <p>22 BY MR. MUNSHI:</p> <p>23 Q. And did you understand that Ms. Liano</p> <p>24 fell within that senior operations management role?</p> <p>25 A. I did.</p>
<p style="text-align: right;">62</p> <p>1 to change his first pass?</p> <p>2 MR. WOOD: Object to the form.</p> <p>3 THE WITNESS: No.</p> <p>4 BY MR. MUNSHI:</p> <p>5 Q. How do you know that it was</p> <p>6 significantly changed?</p> <p>7 A. Because Jim Cook told me.</p> <p>8 Q. What did he tell you?</p> <p>9 A. I'm sorry?</p> <p>10 Q. What did he tell you?</p> <p>11 A. Well, after each time they came back</p> <p>12 from the steering committee meeting, he would call</p> <p>13 his same group together, and he would discuss the</p> <p>14 changes that were made to those charts. So he told</p> <p>15 me in passing what he told Mark Roman, and that is</p> <p>16 his chart hadn't been approved as submitted and</p> <p>17 showed him the changes.</p> <p>18 Q. Did Mr. Cook explain to you why there</p> <p>19 were changes being made to Mark Roman's first pass?</p> <p>20 A. I don't remember.</p> <p>21 Q. Were you given any directives from BCG</p> <p>22 or anybody within CSC about individuals who were</p> <p>23 going to be affected by this delayering process or</p> <p>24 were there any targeted roles?</p> <p>25 MR. WOOD: Object to the form, vague.</p>	<p style="text-align: right;">64</p> <p>1 Q. Were there any other individuals at CSC</p> <p>2 who fell within the senior operations management</p> <p>3 role?</p> <p>4 A. Not in my group.</p> <p>5 Q. And when you say your group, can you</p> <p>6 tell me what your group was?</p> <p>7 A. BSS.</p> <p>8 Q. And describe for me what BSS included.</p> <p>9 A. Jim Cook's organization, which included</p> <p>10 the four industry verticals: Manufacturing,</p> <p>11 healthcare, financial services, and I forget the</p> <p>12 name of the last one, but it was basically</p> <p>13 telecommunications and retail.</p> <p>14 Q. Was that diversified industries?</p> <p>15 A. Yes, thank you.</p> <p>16 Q. Were there any individuals who had a</p> <p>17 senior operations role within any of the other</p> <p>18 verticals besides healthcare with Ms. Liano?</p> <p>19 A. No.</p> <p>20 MR. WOOD: Object to form. Vague as to</p> <p>21 time.</p> <p>22 BY MR. MUNSHI:</p> <p>23 Q. We're talking about the 2012 period, if</p> <p>24 that wasn't clear.</p> <p>25 A. (Witness moves head up and down.)</p>

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<p style="text-align: right;">65</p> <p>1 MR. WOOD: Object to the form. Still</p> <p>2 vague.</p> <p>3 BY MR. MUNSHI:</p> <p>4 Q. Did you understand that Terri Stanton,</p> <p>5 who we mentioned earlier, had an operations role</p> <p>6 within BSS?</p> <p>7 A. No.</p> <p>8 Q. One of the industries under Jim Cook</p> <p>9 was financial services; correct?</p> <p>10 A. Yes.</p> <p>11 Q. Do you know an individual named Brian</p> <p>12 Wallace?</p> <p>13 A. I do.</p> <p>14 Q. And what was Brian Wallace's role in</p> <p>15 2012?</p> <p>16 MR. WOOD: Object to the form. Vague</p> <p>17 as to time.</p> <p>18 THE WITNESS: In early 2012, I believe</p> <p>19 he was in charge of strategy for the financial</p> <p>20 services group. I don't believe he had a title in</p> <p>21 the middle of 2012. I don't remember what his</p> <p>22 final title was.</p> <p>23 BY MR. MUNSHI:</p> <p>24 Q. Putting aside his title, did his actual</p> <p>25 role change in the year 2012?</p>	<p style="text-align: right;">67</p> <p>1 Weaver?</p> <p>2 A. I know of him.</p> <p>3 Q. Did Chris Weaver have an operations</p> <p>4 role at CSC in 2012?</p> <p>5 A. I don't believe so, no.</p> <p>6 Q. Do you know what his role was?</p> <p>7 A. I don't.</p> <p>8 Q. He was not let go by CSC in 2012;</p> <p>9 correct?</p> <p>10 A. I don't remember.</p> <p>11 Q. Do you know an individual named David</p> <p>12 Jaggard, J-A-G-G-A-R-D?</p> <p>13 A. Again, I know of him.</p> <p>14 Q. Did he have an operations role at CSC?</p> <p>15 A. I don't believe so, no.</p> <p>16 Q. Do you know what his role was?</p> <p>17 A. I don't.</p> <p>18 Q. He was not let go by CSC in 2012;</p> <p>19 correct?</p> <p>20 A. I don't believe so.</p> <p>21 Q. Do you know an individual named Nick</p> <p>22 Northam?</p> <p>23 A. I just know the name. I don't remember</p> <p>24 anything about him.</p> <p>25 Q. Do you know if he had an operations</p>
<p style="text-align: right;">66</p> <p>1 A. I don't believe so.</p> <p>2 Q. That strategy role that Mr. Wallace had</p> <p>3 in 2012, was that an operations role?</p> <p>4 A. No, it was not.</p> <p>5 Q. What's the difference between an</p> <p>6 operations role and what Mr. Wallace did in 2012?</p> <p>7 A. He was responsible for leading the</p> <p>8 direction of the product, and I don't believe an</p> <p>9 operations role has that responsibility.</p> <p>10 Q. Mr. Wallace was not let go by CSC;</p> <p>11 correct?</p> <p>12 MR. WOOD: Object to the form. Vague</p> <p>13 as to time.</p> <p>14 THE WITNESS: I don't know that answer.</p> <p>15 BY MR. MUNSHI:</p> <p>16 Q. In 2012.</p> <p>17 A. Oh, no.</p> <p>18 Q. Sorry, let me just redo that, because</p> <p>19 that was a fair objection. Mr. Wallace was not let</p> <p>20 go by CSC in 2012; correct?</p> <p>21 A. No.</p> <p>22 Q. There was also the manufacturing</p> <p>23 division reporting to Mr. Cook; correct?</p> <p>24 A. That's correct.</p> <p>25 Q. Do you know an individual named Chris</p>	<p style="text-align: right;">68</p> <p>1 role at CSC in 2012?</p> <p>2 A. I don't.</p> <p>3 Q. Are you aware that he was not let go by</p> <p>4 CSC in 2012?</p> <p>5 A. I'm not aware either way.</p> <p>6 Q. Was it your decision to terminate</p> <p>7 Ms. Liano's employment?</p> <p>8 A. No.</p> <p>9 Q. Whose decision was it?</p> <p>10 MR. WOOD: Object to the form.</p> <p>11 THE WITNESS: I ultimately believe it</p> <p>12 was Mike Lawrie's decision.</p> <p>13 BY MR. MUNSHI:</p> <p>14 Q. And why do you believe that?</p> <p>15 A. Because the way the spans and the</p> <p>16 layers process went, you could take people out of</p> <p>17 their roles and consolidate that organization at</p> <p>18 that level. But there could be individuals that</p> <p>19 you believed you could find a role for or would</p> <p>20 have relevant skills somewhere else in the company</p> <p>21 at the next layer when we got ready to do that</p> <p>22 delayering work. So they were moved to a holding</p> <p>23 pattern, if you will, until they could -- until we</p> <p>24 could get through that level to discuss.</p> <p>25 That's where Linda -- that's what</p>

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<p style="text-align: right;">69</p> <p>1 happened with Linda. Her role was eliminated, but</p> <p>2 Mark moved her to this holding pattern until we</p> <p>3 could get through the next layer. Linda was put in</p> <p>4 this along with many others. We were led to</p> <p>5 believe that we would go through the layering at</p> <p>6 the next level. And about halfway through that</p> <p>7 process, we were told, due to financial</p> <p>8 constraints, that group in total should come out of</p> <p>9 that holding pattern and should be terminated.</p> <p>10 That decision came from Mike Lawrie and Joe Mason.</p> <p>11 Q. That holding pattern was referred to as</p> <p>12 the talent pool; correct?</p> <p>13 A. That's correct.</p> <p>14 REPORTER: I'm sorry, as the what?</p> <p>15 THE WITNESS: Talent pool.</p> <p>16 BY MR. MUNSHI:</p> <p>17 Q. Just focus -- we'll get to the talent</p> <p>18 pool part of it next. But, first, on the first</p> <p>19 step of Ms. Liano's role actually being eliminated,</p> <p>20 it's your understanding that that was Mike Lawrie's</p> <p>21 decision to eliminate Linda Liano's role?</p> <p>22 A. It's my understanding that that's the</p> <p>23 result of the steering committee meeting that day.</p> <p>24 Q. And you were not present for that</p> <p>25 meeting; correct?</p>	<p style="text-align: right;">71</p> <p>1 Q. What do you recall him saying?</p> <p>2 A. Well, I don't recall the entire</p> <p>3 conversation. I know that he was disappointed that</p> <p>4 his organization was structured in the way it was.</p> <p>5 He had put up an organization that had quite a few</p> <p>6 number of different roles, and it came back much</p> <p>7 more -- much less diversified than he wanted, and</p> <p>8 that was -- he was disappointed in that.</p> <p>9 Q. And what does diversified mean in that</p> <p>10 context?</p> <p>11 A. Well, that he had probably eight or</p> <p>12 nine boxes on the org chart. It came back with</p> <p>13 three.</p> <p>14 Q. Were -- you're aware there were other</p> <p>15 individuals who reported directly to Mr. Roman in</p> <p>16 mid 2012; correct?</p> <p>17 A. Yes, yes.</p> <p>18 Q. Were any of those individuals</p> <p>19 terminated as part of the layering process?</p> <p>20 A. I don't remember.</p> <p>21 Q. Were any of the other individuals who</p> <p>22 reported to Mr. Roman in 2012, besides Ms. Liano,</p> <p>23 placed in that talent pool?</p> <p>24 A. I don't remember.</p> <p>25 Q. Are you aware that Ms. Liano herself</p>
<p style="text-align: right;">70</p> <p>1 A. No.</p> <p>2 Q. Did you ever have a conversation with</p> <p>3 Mike Lawrie about eliminating Linda Liano's role?</p> <p>4 A. No.</p> <p>5 Q. Did you ever have a conversation with</p> <p>6 Mark Roman about eliminating Linda Liano's role?</p> <p>7 A. Yes.</p> <p>8 Q. When did you have the first</p> <p>9 conversation with Mr. Roman?</p> <p>10 A. It would have been during the month</p> <p>11 that we were doing her layer. I don't remember</p> <p>12 exactly what month that was.</p> <p>13 Q. And what do you recall of that</p> <p>14 conversation that you had with Mr. Roman?</p> <p>15 A. That that position had been eliminated,</p> <p>16 and Linda would have to be taken out of that</p> <p>17 position.</p> <p>18 Q. Was this before or after Mr. Roman's</p> <p>19 first pass at his org chart?</p> <p>20 A. It would have been after.</p> <p>21 Q. Did Mr. Roman express to you that he</p> <p>22 disagreed with taking Ms. Liano out of this</p> <p>23 position?</p> <p>24 A. I don't believe he said it just like</p> <p>25 that.</p>	<p style="text-align: right;">72</p> <p>1 had several individuals who reported directly to</p> <p>2 her in 2012?</p> <p>3 A. No, I don't remember that.</p> <p>4 Q. Did you participate in that layer of</p> <p>5 the layering process under Ms. Liano?</p> <p>6 A. I led the process, yes.</p> <p>7 Q. Do you recall having any conversations</p> <p>8 with Mr. Roman about that layer, the one that</p> <p>9 reports to Ms. Liano?</p> <p>10 A. No.</p> <p>11 Q. Have you ever seen any documents that</p> <p>12 states or reflects why Ms. Liano specifically was</p> <p>13 chosen for this termination?</p> <p>14 MR. WOOD: Object to the form. Lack of</p> <p>15 foundation and vague.</p> <p>16 THE WITNESS: No.</p> <p>17 BY MR. MUNSHI:</p> <p>18 Q. Have you ever seen any sort of</p> <p>19 electronic mail or a memo to the file or a note</p> <p>20 from anybody that specifically says why Ms. Liano</p> <p>21 was terminated?</p> <p>22 MR. WOOD: Object to the form.</p> <p>23 THE WITNESS: No.</p> <p>24 BY MR. MUNSHI:</p> <p>25 Q. Do you know if any such documents</p>

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<p style="text-align: right;">73</p> <p>1 exists?</p> <p>2 A. I don't.</p> <p>3 MR. WOOD: Object to the form. Vague.</p> <p>4 THE WITNESS: I don't.</p> <p>5 BY MR. MUNSHI:</p> <p>6 Q. As an HR professional, you would agree</p> <p>7 with me that it would be best practices for HR for</p> <p>8 such a document to exist?</p> <p>9 A. I do.</p> <p>10 MR. WOOD: Object to the form. Vague,</p> <p>11 lack of foundation, and argumentative.</p> <p>12 THE WITNESS: I absolutely do think</p> <p>13 that.</p> <p>14 BY MR. MUNSHI:</p> <p>15 Q. Okay. Have you ever seen any document</p> <p>16 that was created for any individual who was</p> <p>17 terminated as part of this delayering process</p> <p>18 stating why that individual was chosen?</p> <p>19 MR. WOOD: Object to the form.</p> <p>20 THE WITNESS: No.</p> <p>21 BY MR. MUNSHI:</p> <p>22 Q. Do you know if any were created?</p> <p>23 A. I don't.</p> <p>24 Q. Did you ever communicate with Mr. Roman</p> <p>25 over e-mail about the structure of his organization</p>	<p style="text-align: right;">75</p> <p>1 Q. Are you aware of any factors that were</p> <p>2 relied upon with regard to Ms. Liano that led to</p> <p>3 the conclusion that she was going to be fired by</p> <p>4 the company?</p> <p>5 MR. WOOD: Object to the form.</p> <p>6 THE WITNESS: Yes. She was --</p> <p>7 BY MR. MUNSHI:</p> <p>8 Q. What factors were those?</p> <p>9 A. She was in the talent pool, and the</p> <p>10 talent pool was to be eliminated.</p> <p>11 Q. Prior to the talent pool, are you aware</p> <p>12 of any factors that were relied upon by CSC to</p> <p>13 eliminate her position?</p> <p>14 MR. WOOD: Object to the form.</p> <p>15 Argumentative.</p> <p>16 THE WITNESS: Her position? Yes.</p> <p>17 BY MR. MUNSHI:</p> <p>18 Q. And what factors are those?</p> <p>19 A. Well, those are the factors that Mark</p> <p>20 put up a chart, it went to the steering committee,</p> <p>21 was disapproved, and it came back. She was -- her</p> <p>22 position was no longer on that chart. So Mark put</p> <p>23 her in the talent pool.</p> <p>24 Q. Okay. And in that initial period of</p> <p>25 Mr. Roman putting her on an organizational chart</p>
<p style="text-align: right;">74</p> <p>1 as part of this delayering process?</p> <p>2 MR. WOOD: Object to the form.</p> <p>3 THE WITNESS: I don't remember.</p> <p>4 BY MR. MUNSHI:</p> <p>5 Q. Did you ever communicate with Mr. Cook</p> <p>6 about what this organization under Mr. Roman would</p> <p>7 look like as part of the delayering process?</p> <p>8 MR. WOOD: Object to the form. Asked</p> <p>9 and answered.</p> <p>10 THE WITNESS: I don't remember.</p> <p>11 BY MR. MUNSHI:</p> <p>12 Q. The result of the steering committee</p> <p>13 meeting was that Ms. Liano was no longer on</p> <p>14 Mr. Roman's organizational chart. Do you have any</p> <p>15 understanding of how they reached that conclusion?</p> <p>16 MR. WOOD: Object to the form. Lack of</p> <p>17 foundation.</p> <p>18 THE WITNESS: No.</p> <p>19 BY MR. MUNSHI:</p> <p>20 Q. Do you have any idea what factors were</p> <p>21 relied on by anybody at CSC to decide that</p> <p>22 Ms. Liano was no longer going to be employed there?</p> <p>23 MR. WOOD: Object to the form.</p> <p>24 THE WITNESS: Say that again, please.</p> <p>25 BY MR. MUNSHI:</p>	<p style="text-align: right;">76</p> <p>1 and then she's no longer on an organizational</p> <p>2 chart, what factors did CSC rely upon to get to</p> <p>3 that conclusion that she's no longer on the chart?</p> <p>4 MR. WOOD: Object to the form.</p> <p>5 THE WITNESS: I don't know.</p> <p>6 BY MR. MUNSHI:</p> <p>7 Q. I'm sorry, did you say...</p> <p>8 A. I don't know.</p> <p>9 Q. Were there any other individuals within</p> <p>10 human resources that had any role in this</p> <p>11 delayering as it pertained to Mr. Roman's group?</p> <p>12 MR. WOOD: Object to the form. Vague.</p> <p>13 THE WITNESS: No.</p> <p>14 BY MR. MUNSHI:</p> <p>15 Q. Sitting here right now, Ms. Stafford,</p> <p>16 do you have any understanding as to why Ms. Liano</p> <p>17 was on the chart for Mr. Roman's group and then was</p> <p>18 no longer was on that chart? Do you know what</p> <p>19 happened?</p> <p>20 MR. WOOD: Object to the form.</p> <p>21 THE WITNESS: I know Mark proposed an</p> <p>22 organization that included keeping Linda in there.</p> <p>23 And when the -- when that was not approved by the</p> <p>24 steering committee and it came back with just three</p> <p>25 boxes to be filled, that Mark valued Linda enough</p>

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<p style="text-align: right;">77</p> <p>1 to, instead of terminate her, put her in the talent 2 pool. Beyond that, Mike Lawrie and Joe Mason 3 decided that the talent pool was going to need to 4 be eliminated and not reallocated through the 5 organization. So despite our efforts, she had to 6 be terminated. 7 BY MR. MUNSHI: 8 Q. Before we even get to the talent pool, 9 do you know what Mike Lawrie and Joe Mason and 10 whoever else was on the steering committee, what 11 factors they were relying upon or any criteria that 12 they were relying upon that resulted in Ms. Liano 13 no longer being on the organizational chart? 14 MR. WOOD: Object to the form. 15 THE WITNESS: No. 16 BY MR. MUNSHI: 17 Q. Did you ever ask anybody? 18 A. No. 19 Q. Did you ever see any document, any 20 e-mail, any memo to the file, anything written down 21 that says why Ms. Liano is no longer on an 22 organizational chart? 23 MR. WOOD: Object to the form. Lack of 24 foundation. 25 THE WITNESS: No.</p>	<p style="text-align: right;">79</p> <p>1 were functionally approved, then we came back and 2 we had to staff the department as it was approved. 3 So that's why it's different. 4 BY MR. MUNSHI: 5 Q. That staffing step, Ms. Liano was never 6 even part of any conversations of staffing; right? 7 She never even got that far? 8 MR. WOOD: Object to the form. Lack of 9 foundation, argumentative. 10 THE WITNESS: She would never have been 11 part of a staffing step for her own role. 12 BY MR. MUNSHI: 13 Q. Right. But she never even -- 14 A. Had she stayed, she would have been 15 part of a staffing conversation for the next layer 16 down. 17 Q. So going back to my previous question, 18 what is abnormal about what was happening at CSC to 19 warrant not following HR best practices and writing 20 down somewhere why Ms. Liano's position was 21 eliminated? 22 MR. WOOD: Object to the form. Lack of 23 foundation, argumentative, and vague. 24 THE WITNESS: It was about the 25 position, not the person. And so the position was</p>
<p style="text-align: right;">78</p> <p>1 BY MR. MUNSHI: 2 Q. And as an HR professional, do you agree 3 with me that it would be best practices of HR for 4 some sort of a document to exist that says why 5 she's no longer on the org charts? 6 MR. WOOD: Object to the form. 7 THE WITNESS: Yes, under normal 8 circumstances, I would absolutely agree with you. 9 BY MR. MUNSHI: 10 Q. Is there anything about what's 11 happening here that's not normal? 12 MR. WOOD: Object to the form. Vague. 13 THE WITNESS: Extremely. 14 BY MR. MUNSHI: 15 Q. What makes this situation so abnormal 16 as to not have to follow HR best practices? 17 MR. WOOD: Object to form. 18 THE WITNESS: We were working through 19 an organizational delayering process. We had a new 20 CEO that had come to the company, and he had stated 21 that we were going to decrease our spans and 22 layers, improve our managers' span of control, and 23 manage our financials. So as part of this process, 24 we looked at org charts, not people in the boxes on 25 the org charts. And then after those org charts</p>	<p style="text-align: right;">80</p> <p>1 eliminated. We tried to retain the person, and 2 that didn't survive. That effort didn't survive 3 that layer. 4 BY MR. MUNSHI: 5 Q. Okay. So let's take Ms. Liano out of 6 it, and let's just talk about the position. Have 7 you ever seen any document, any e-mail, any note to 8 the file, any memorandum that states why a 9 particular position that Ms. Liano held was 10 eliminated as part of this delayering process? 11 MR. WOOD: Object to the form. 12 THE WITNESS: No. 13 BY MR. MUNSHI: 14 Q. Are you aware any such document exists? 15 A. No. 16 Q. I believe you have a stack of documents 17 in front of you. And if you don't, we can grab all 18 of those. 19 A. I don't. 20 REPORTER: Hold on, hold on. 21 THE WITNESS: I do. 22 BY MR. MUNSHI: 23 Q. You'll see in this stack of documents, 24 all of them have a sticker in the lower right-hand 25 corner, an exhibit sticker. Do you see that?</p>

20 (Pages 77 to 80)

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<p style="text-align: right;">81</p> <p>1 A. I do now, yes.</p> <p>2 Q. If you can find the document that has a</p> <p>3 sticker that says Plaintiff's Exhibit 14, one four.</p> <p>4 A. Okay.</p> <p>5 MR. WOOD: May I see the document?</p> <p>6 BY MR. MUNSHI:</p> <p>7 Q. And this should be Defendant's Answers</p> <p>8 to Plaintiff's Interrogatories. Do you see that up</p> <p>9 top?</p> <p>10 A. I do.</p> <p>11 Q. Okay. And you'll see on the first</p> <p>12 page, it says Interrogatory Number 1, and it says:</p> <p>13 Answer to Interrogatory Number 1.</p> <p>14 Do you see that?</p> <p>15 A. Yes.</p> <p>16 Q. Okay. Interrogatory Number 1 asks CSC</p> <p>17 to state with specificity each and every</p> <p>18 legitimate, nondiscriminatory reason as to why</p> <p>19 defendant terminated plaintiff's employment and</p> <p>20 describe the factual basis for this decision.</p> <p>21 Do you see that?</p> <p>22 A. I do.</p> <p>23 Q. Going down to the bottom of page 1, the</p> <p>24 last sentence, it says: Their contribution --</p> <p>25 referring to BCG -- included assistance redefining</p>	<p style="text-align: right;">83</p> <p>1 with BCG about Mark Roman's organization?</p> <p>2 A. Yes, of course.</p> <p>3 Q. And what was the nature of your</p> <p>4 communications, just looking at Mark Roman's</p> <p>5 organization?</p> <p>6 A. Well, BCG provided us the documents</p> <p>7 that we put in place. They provided -- they</p> <p>8 provided us with a practice that we should go</p> <p>9 through to make sure that we were delayering it</p> <p>10 according to what they wanted to. We would talk</p> <p>11 back and forth about the organization, and they</p> <p>12 would help us -- force us, really, to define what</p> <p>13 the organization was responsible for and help us</p> <p>14 look at the spans of control and just lead us</p> <p>15 generally through a process that would allow to us</p> <p>16 then submit a recommended org chart.</p> <p>17 Q. So let's take a snapshot in time as the</p> <p>18 date and time that you learned that the first pass</p> <p>19 that Mr. Roman submitted on his organizational</p> <p>20 chart then came back and there were only three</p> <p>21 boxes in there, so that snapshot in time.</p> <p>22 A. Okay.</p> <p>23 Q. Did you have any conversations with BCG</p> <p>24 prior to that snapshot in time about Mr. Roman's</p> <p>25 organization?</p>
<p style="text-align: right;">82</p> <p>1 roles and reporting relationships and, in turn,</p> <p>2 identifying positions within the organization</p> <p>3 (based on functional role, not any personal</p> <p>4 factors) which could be eliminated or consolidated.</p> <p>5 Do you see that?</p> <p>6 A. I do.</p> <p>7 Q. Describe for me -- let me start over.</p> <p>8 Did you have any communications with any</p> <p>9 representatives of BCG in connection with this</p> <p>10 delayering process?</p> <p>11 A. I did.</p> <p>12 Q. What was the nature of your</p> <p>13 communications with the BCG?</p> <p>14 MR. WOOD: Object to the form. Vague.</p> <p>15 THE WITNESS: Well, they were</p> <p>16 responsible for the process. They were our</p> <p>17 consultants for the process. So I had people at</p> <p>18 BCG that I worked with, different people depending</p> <p>19 on what part of the organization I was working</p> <p>20 with.</p> <p>21 BY MR. MUNSHI:</p> <p>22 Q. Organization you were working with, do</p> <p>23 you mean within CSC?</p> <p>24 A. Yes.</p> <p>25 Q. Okay. Did you have any communications</p>	<p style="text-align: right;">84</p> <p>1 A. Not that I can recall.</p> <p>2 Q. After that snapshot in time, did you</p> <p>3 have communications with BCG about Mr. Roman's</p> <p>4 organization?</p> <p>5 A. Yes.</p> <p>6 Q. Do you know if Mr. Roman had any</p> <p>7 communications with BCG prior to that snapshot in</p> <p>8 time I just --</p> <p>9 A. I don't.</p> <p>10 Q. At any point did you have e-mail</p> <p>11 communications with BCG as it pertained to</p> <p>12 Mr. Roman's organization?</p> <p>13 A. I don't recall.</p> <p>14 Q. When you communicated with individuals</p> <p>15 at BCG, would you do it over e-mail or over phone,</p> <p>16 or how would you do it, or in person?</p> <p>17 A. Generally in person.</p> <p>18 Q. Would this be at Falls Church?</p> <p>19 A. Yes.</p> <p>20 Q. This interrogatory response that I just</p> <p>21 read stated that there would be positions within</p> <p>22 the organization based on functional role, not any</p> <p>23 personal factors.</p> <p>24 Do you see that, what I read before?</p> <p>25 A. I do.</p>

21 (Pages 81 to 84)

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<p style="text-align: right;">85</p> <p>1 Q. Based on your understanding of how the 2 delayering process went at CSC, is this an accurate 3 statement? 4 A. It is. 5 Q. What was Ms. Liano's functional role? 6 A. I don't recall her title. 7 Q. Well, there is nothing in here about 8 title. We're talking about functional role. Do 9 you recall what her functional role was? 10 A. I believe she was responsible for an 11 operations group. That is what I was trying to 12 recall. 13 Q. Was Ms. Liano's position eliminated in 14 full, or was it consolidated with another position? 15 MR. WOOD: Object to the form. 16 THE WITNESS: I believe it was 17 eliminated in full. 18 BY MR. MUNSHI: 19 Q. Did anybody take over Ms. Liano's job 20 duties? 21 A. No. 22 Q. Okay. Ms. Liano worked at CSC for 23 many, many years. Presumably she had work to do. 24 Did anybody do that work anymore? What happened to 25 it?</p>	<p style="text-align: right;">87</p> <p>1 responsibilities. Then her employment is 2 terminated. Who took over doing the work that 3 Ms. Liano was previously doing? 4 MR. WOOD: Object to the form. Lack of 5 foundation. 6 THE WITNESS: As I said just a moment 7 ago, I believe part of it went to the sales 8 organization. I think part of it went to the sales 9 commission piece that we were newly standing up and 10 consolidating. I think other parts of it must have 11 gone to other parts of the organization, but I 12 don't know who. I did not work with Mark and his 13 team to transition responsibilities. 14 BY MR. MUNSHI: 15 Q. Did Ms. Liano's work performance as CSC 16 play any role in the decision to terminate her? 17 A. Absolutely not. 18 Q. If you turn to the second -- the next 19 page of P 14, it's the continuation of response to 20 Interrogatory Number 1. It says here: Plaintiff, 21 an at-will employee, was laid off as part of a 22 reduction in force instituted in connection with 23 the reorganization process. Prior to the 24 reorganization, plaintiff held the only operations 25 position in the global healthcare group reporting</p>
<p style="text-align: right;">86</p> <p>1 A. Not any one person did that work. So 2 part of it was sent to a sales role. Part of it 3 was sent to a commission role. I'm sure she did 4 other things with the staff you tell me she has, 5 but I don't know what those were. 6 Q. So do you know any individual at CSC 7 who was retained who then did any of the job duties 8 that Ms. Liano previously did? 9 A. Who was retained in the same layer that 10 she was in? 11 Q. Retained as part of the delayering 12 process. 13 MR. WOOD: Object to the form. 14 THE WITNESS: There is no way to draw a 15 complete conclusion on that. The delayering 16 process took months, and there were 13 layers that 17 we delayered. So where you started here and where 18 you ended up could take conversations and layers 19 over several months of conversation. So it's not 20 like you picked up one thing and just dropped it 21 somewhere else. 22 BY MR. MUNSHI: 23 Q. Okay. My question is meant to be much 24 simpler than that. Prior to Ms. Liano's 25 termination, she had certain job duties and</p>	<p style="text-align: right;">88</p> <p>1 to Mark Roman. The reorganization designed by BCG 2 changed Mr. Roman's role and placed each of his 3 direct reports (and the span of their reporting 4 employs) into other organizational areas, based on 5 functional role. 6 Based on your understanding, is that an 7 accurate statement? 8 MR. WOOD: Objection to form. The 9 quotation should be: Prior direct reports. 10 BY MR. MUNSHI: 11 Q. Okay. 12 A. Well, first of all, BCG didn't design 13 it, so I wouldn't think that's accurate. BCG 14 didn't place any of his prior direct reports into 15 any other organizational efforts or areas. Those 16 were done by Mr. Roman in conjunction with others 17 in the organization. 18 BY MR. MUNSHI: 19 Q. And in the organization, you mean CSC 20 employees -- 21 A. Yes. 22 Q. -- correct? Where it says here, the 23 reorganization designed by BCG, is it your 24 understanding that that should be reorganization 25 designed by CSC?</p>

22 (Pages 85 to 88)

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<p style="text-align: right;">89</p> <p>1 MR. WOOD: Object to the form.</p> <p>2 THE WITNESS: CSC was responsible for</p> <p>3 implementing a design that BCG brought to us. We</p> <p>4 then took their best practice and delayed the</p> <p>5 organization according to those terms.</p> <p>6 BY MR. MUNSHI:</p> <p>7 Q. So ultimately who did the</p> <p>8 reorganization, was it BCG or CSC making these</p> <p>9 decisions?</p> <p>10 MR. WOOD: Objection to the form.</p> <p>11 Vague.</p> <p>12 THE WITNESS: Making these decisions,</p> <p>13 it was absolutely CSC. BCG had no authority to do</p> <p>14 that.</p> <p>15 BY MR. MUNSHI:</p> <p>16 Q. Did BCG have any authority to decide</p> <p>17 which positions were going to be eliminated by CSC?</p> <p>18 A. No.</p> <p>19 MR. WOOD: Object to the form.</p> <p>20 BY MR. MUNSHI:</p> <p>21 Q. Did BCG have any authority to decide</p> <p>22 what Mr. Roman's organization was going to look</p> <p>23 like after the delayering process?</p> <p>24 MR. WOOD: Object to the form.</p> <p>25 THE WITNESS: Not to my understanding.</p>	<p style="text-align: right;">91</p> <p>1 THE WITNESS: Yes.</p> <p>2 BY MR. MUNSHI:</p> <p>3 Q. Did BCG have any authority to decide</p> <p>4 which roles or positions --</p> <p>5 A. I'm sorry. You cut out.</p> <p>6 REPORTER: We couldn't hear you.</p> <p>7 BY MR. MUNSHI:</p> <p>8 Q. Did BCG have any authority to decide</p> <p>9 which positions were going to be retained as part</p> <p>10 of this delayering process?</p> <p>11 A. No, sir.</p> <p>12 MR. WOOD: Object to the form.</p> <p>13 BY MR. MUNSHI:</p> <p>14 Q. Were all of these decisions that we</p> <p>15 just went through made by the CSC steering</p> <p>16 committee?</p> <p>17 MR. WOOD: Object to the form. Vague</p> <p>18 as to the reference.</p> <p>19 THE WITNESS: As far as I know, yes.</p> <p>20 BY MR. MUNSHI:</p> <p>21 Q. Did you have any e-mail communications</p> <p>22 with Jim Cook about what Mr. Roman's organizational</p> <p>23 structure was going to look like as part of this</p> <p>24 delayering process?</p> <p>25 A. No.</p>
<p style="text-align: right;">90</p> <p>1 BY MR. MUNSHI:</p> <p>2 Q. The next sentence of Interrogatory</p> <p>3 Number 2 states: The operations role, however, did</p> <p>4 not fit in the newly-structured business</p> <p>5 organization, and the position was not included in</p> <p>6 the new organizational design.</p> <p>7 Do you see that?</p> <p>8 A. It's in Interrogatory Number 1;</p> <p>9 correct?</p> <p>10 Q. Yes, it's the next sentence of where we</p> <p>11 left off. So it's the middle of that response.</p> <p>12 A. Yeah, I see it.</p> <p>13 Q. Page 2.</p> <p>14 A. I see it. It's just Interrogatory</p> <p>15 Number 1.</p> <p>16 Q. Correct. So that response right there,</p> <p>17 did BCG have any authority to decide what</p> <p>18 operations role would or would not fit into the</p> <p>19 newly-structured business organization?</p> <p>20 MR. WOOD: Object to the form.</p> <p>21 THE WITNESS: No.</p> <p>22 BY MR. MUNSHI:</p> <p>23 Q. That was a CSC decision; is that</p> <p>24 correct?</p> <p>25 MR. WOOD: Object to the form.</p>	<p style="text-align: right;">92</p> <p>1 Q. Any e-mail communications with anybody</p> <p>2 on the steering committee about Mr. Roman's</p> <p>3 organization?</p> <p>4 A. No.</p> <p>5 Q. And the -- and you did have</p> <p>6 communications with Mr. Roman obviously. Did you</p> <p>7 take any notes on your communications with</p> <p>8 Mr. Roman about what his organization structure</p> <p>9 would look like?</p> <p>10 MR. WOOD: Object to the form.</p> <p>11 THE WITNESS: I don't recall.</p> <p>12 BY MR. MUNSHI:</p> <p>13 Q. Any e-mails with Mr. Roman that you</p> <p>14 recall?</p> <p>15 A. No.</p> <p>16 MR. WOOD: Object to the form. Vague.</p> <p>17 BY MR. MUNSHI:</p> <p>18 Q. -- would look like?</p> <p>19 A. No.</p> <p>20 REPORTER: I'm sorry. Could you repeat</p> <p>21 that last question?</p> <p>22 BY MR. MUNSHI:</p> <p>23 Q. Sure. Any e-mail communications with</p> <p>24 Mr. Roman about what his organizational structure</p> <p>25 would look like?</p>

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<p style="text-align: right;">93</p> <p>1 MR. WOOD: Object to the form. Vague 2 as to time. 3 THE WITNESS: Not that I recall. 4 BY MR. MUNSHI: 5 Q. When you were working with Mr. Roman, 6 was that typically -- sorry. When you were working 7 with Mr. Roman specifically about what his 8 organizational structure would look like, were 9 those in person or over the phone? 10 A. Almost always over the phone. 11 Q. Would anyone else participate in those 12 phone calls? 13 A. Jim Cook could have. I don't remember. 14 Q. Anyone else you recall? 15 A. No. 16 MR. WOOD: Object to the form. 17 THE WITNESS: No. 18 BY MR. MUNSHI: 19 Q. So let's talk a little bit about the 20 talent pool that we referenced earlier. Did you, 21 Ms. Stafford, play any role in the decision as to 22 placing Ms. Liano into that talent pool? 23 A. I guess you could say I did. 24 Q. And describe for me what role you would 25 play.</p>	<p style="text-align: right;">95</p> <p>1 et cetera, then it was up to myself and the leader 2 of the group to make sure that, just like we had in 3 earlier layers, that we had the right people in the 4 roles that we had. So then under normal 5 circumstances, we could have made the decision to 6 take someone out of the talent pool and have them 7 replaced by someone else in the organization. 8 Q. So with regard to Ms. Liano, the way 9 she's placed in that talent pool -- sorry, is there 10 feedback or -- 11 MR. WOOD: Yeah, it is somewhat 12 difficult. 13 THE WITNESS: A little bit. 14 MR. WOOD: And now we've got a fan on. 15 VIDEOGRAPHER: It's this whole thing -- 16 there it goes. How is this now? 17 MUNSHI: That's fine on my end. 18 THE WITNESS: Okay here too. 19 BY MR. MUNSHI: 20 Q. With regard to Ms. Liano specifically, 21 while she was placed in that talent pool, was there 22 anybody trying to find her another position 23 within -- 24 MR. WOOD: We're still getting 25 feedback, sorry.</p>
<p style="text-align: right;">94</p> <p>1 A. Well, Mark felt that Linda was a 2 valuable contributor to his organization. He was 3 disappointed that she -- her position has been 4 eliminated. So he and I discussed the option of 5 outright termination or putting her in the talent 6 pool to see if there would be another role for her. 7 Q. And once she was placed in that talent 8 pool, was anybody looking for a position for her? 9 MR. WOOD: Object to the form. 10 BY MR. MUNSHI: 11 Q. I'll ask a better question. 12 Essentially, how did it work? Once she has been 13 designated to be in that talent pool, what's 14 happening next to her employment? 15 A. Well, in most of the layers, what 16 happened was that talent pool sat basically off to 17 the side. We finished the layer that we were 18 working on. And then the week after we finished 19 that layer, which meant that we included all of the 20 terminations that went with that, those staffing 21 decisions, we started working on the next layer 22 down. 23 As we got to the staffing phase of the 24 next layer and that organization became more 25 apparent, it had been through all of the reviews,</p>	<p style="text-align: right;">96</p> <p>1 MR. MUNSHI: Yeah, so are we. 2 VIDEOGRAPHER: You're cutting in and 3 out just a tad. 4 MUNSHI: Should we go off for a minute 5 and try to fix this? 6 MR. WOOD: Yeah, let's do that. 7 VIDEOGRAPHER: All right. Sure. We'll 8 now go off the record. This will also conclude 9 tape number 1 in our video deposition today. The 10 time on the monitor is approximately 3:46 p.m. 11 (Off-the-record conference.) 12 VIDEOGRAPHER: We are now back on the 13 record. This is the beginning of tape number 2 in 14 our video deposition today. The time on the 15 monitor is approximately 3:57 p.m. 16 BY MR. MUNSHI: 17 Q. Ms. Stafford, before we took our break 18 just now, we were talking about the talent pool. 19 While Ms. Liano was placed in that talent pool, was 20 there anybody who was tasked with finding another 21 position for her? 22 A. Not in the pool she was in. 23 Q. Were there other pools where people 24 were tasked with finding positions? 25 A. Not exactly. Let me just explain it.</p>

24 (Pages 93 to 96)

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<p style="text-align: right;">97</p> <p>1 So remember I said a moment ago that the order was</p> <p>2 we did the design, the design was approved, we came</p> <p>3 back and staffed the design, either terminated some</p> <p>4 and moved some to -- very few. The talent pool was</p> <p>5 the exception to the rule, not the rule. The rule</p> <p>6 was we terminated. So in Ms. Liano's case, Mark</p> <p>7 wanted to find another role for her if he could.</p> <p>8 So he postponed that decision basically by putting</p> <p>9 her in the talent pool.</p> <p>10 Had she stayed in the talent pool, when</p> <p>11 we went through the next level of layering, which</p> <p>12 would have been the next level under her, then she</p> <p>13 would have been considered for that, and there</p> <p>14 would have been people looking to fill roles with</p> <p>15 the best people. In Ms. Liano's case, she was</p> <p>16 placed in the talent pool that didn't get that</p> <p>17 opportunity.</p> <p>18 In December we were told by the CEO of</p> <p>19 the company that we needed the financial pickup</p> <p>20 that we would get from that talent pool, so he</p> <p>21 asked us to terminate the entire pool. Therefore,</p> <p>22 nobody came out of -- very few people came out of</p> <p>23 that pool to other roles.</p> <p>24 Q. Okay. So when Ms. Liano was placed in</p> <p>25 the talent pool, was there just one talent pool at</p>	<p style="text-align: right;">99</p> <p>1 Q. So at some point, there is zero people</p> <p>2 in the talent pool; right?</p> <p>3 A. Yes.</p> <p>4 Q. And then the next layer happens, and</p> <p>5 the talent pool is then replenished?</p> <p>6 A. I don't believe so. I think after that</p> <p>7 experience, we -- and because of our financial --</p> <p>8 because of our financials, I don't believe we ever</p> <p>9 had another talent pool after that.</p> <p>10 Q. Okay. So ultimately was everybody who</p> <p>11 was placed in the talent pool, including Ms. Liano,</p> <p>12 terminated?</p> <p>13 MR. WOOD: Object to the form.</p> <p>14 THE WITNESS: In the talent pool that</p> <p>15 she was placed in -- ask your question again,</p> <p>16 please.</p> <p>17 BY MR. MUNSHI:</p> <p>18 Q. Right. So just as you were about to</p> <p>19 say, the talent pool that she was placed in, does</p> <p>20 that mean that there are other talent pools that</p> <p>21 existed that she was not placed in?</p> <p>22 A. Well, just in other layers, like the</p> <p>23 layers on top of hers.</p> <p>24 Q. Okay. So just within her layer, the</p> <p>25 talent pool of her layer, were all of those</p>
<p style="text-align: right;">98</p> <p>1 that time, or were there multiple talent pools?</p> <p>2 A. Just one.</p> <p>3 Q. Okay. So when was she -- if she was</p> <p>4 terminated on December 12th, when was she placed</p> <p>5 into the talent pool?</p> <p>6 A. I don't remember the dates. It was</p> <p>7 during the whole L -- let me think, one, two,</p> <p>8 three -- L4 process.</p> <p>9 Q. Okay. And since you were going layer</p> <p>10 by layer, is it correct that her talent pool</p> <p>11 contained all individuals at her layer and above?</p> <p>12 A. That --</p> <p>13 MR. WOOD: Object to the form.</p> <p>14 THE WITNESS: -- should be correct,</p> <p>15 yes. Should be correct.</p> <p>16 BY MR. MUNSHI:</p> <p>17 Q. Okay. So she's placed in this talent</p> <p>18 pool. And while she is in there, at that point, no</p> <p>19 one is tasked with trying to find her another</p> <p>20 position; is that right?</p> <p>21 A. No one specific person is tasked with</p> <p>22 it, that's correct.</p> <p>23 Q. And then at some point in December, the</p> <p>24 entire talent pool is terminated; is that right?</p> <p>25 A. That's correct, yes.</p>	<p style="text-align: right;">100</p> <p>1 individuals terminated?</p> <p>2 A. Not all. You could have made a case</p> <p>3 with justification that had to go up to the CEO</p> <p>4 that a certain individual should be taken out of</p> <p>5 that talent pool and given a role. And if an</p> <p>6 organization won the ability to do that, they had</p> <p>7 to replace that individual's salary by terminating</p> <p>8 others in the organization, in their organization.</p> <p>9 Q. Okay. Do you still have Plaintiff's</p> <p>10 Exhibit 14 in front of you?</p> <p>11 A. I do.</p> <p>12 Q. And if you recall, we left off in the</p> <p>13 middle of the response to Interrogatory Number 1.</p> <p>14 A. Yes.</p> <p>15 Q. So the next sentence where we left off</p> <p>16 states: This effectively eliminated plaintiff's</p> <p>17 position. Plaintiff was placed into a talent pool</p> <p>18 for potential future consideration later in the</p> <p>19 reorganization process. Subsequently, however, CSC</p> <p>20 laid off the entire talent pool in order to achieve</p> <p>21 cost take out goals.</p> <p>22 So that is not a fully accurate</p> <p>23 statement; right?</p> <p>24 MR. WOOD: Objection to the form. Lack</p> <p>25 of foundation and argumentative.</p>

25 (Pages 97 to 100)

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<p style="text-align: right;">101</p> <p>1 THE WITNESS: It's a fully accurate 2 statement, but not everybody that had been there at 3 the beginning ultimately was the one that came out. 4 We would have placed other people, as I described. 5 You could save one, if you will, with a 6 justification to the CEO, and then you would have 7 to replace them with others in the organization. 8 That was very much by exception, and I would 9 believe less than two handfuls of people were able 10 to do that, probably less than that. 11 BY MR. MUNSHI: 12 Q. Was there any conversation with 13 Mr. Roman that you had where you talked about 14 making a justification or making a case for 15 Ms. Liano? 16 MR. WOOD: Object to the form. 17 THE WITNESS: I don't recall. 18 BY MR. MUNSHI: 19 Q. Who ultimately made the decision to 20 eliminate the entire talent pool that Ms. Liano was 21 in? 22 A. I believe it was the CEO and the chief 23 of staff. 24 Q. So back to Lawrie and Mason? 25 A. Yes, sir.</p>	<p style="text-align: right;">103</p> <p>1 process? 2 A. Yes. 3 Q. Were there any conversations that you 4 had with Mr. Roman about limiting his design to 5 only affect individuals who were placed in North 6 America? 7 MR. WOOD: Object to the form. 8 THE WITNESS: Say that again, please. 9 BY MR. MUNSHI: 10 Q. Sure. When you were having 11 conversations with Mr. Roman about his 12 organizational structure, were there any 13 conversations about treating North American 14 individuals differently than global individuals? 15 MR. WOOD: Object to the form. Vague. 16 THE WITNESS: No. 17 BY MR. MUNSHI: 18 Q. In other words, there were individuals 19 outside of North America who reported to Mr. Roman 20 who theoretically could have been impacted by this 21 delayering; correct? 22 A. Well, I believe, at the time, Mr. Roman 23 had just North American responsibilities. 24 Q. Are you aware of any individuals who 25 were located outside of North America who reported</p>
<p style="text-align: right;">102</p> <p>1 Q. Were all individuals employed by CSC 2 who had senior operations functions terminated as 3 part of this delayering process? 4 MR. WOOD: Object to the form. Vague. 5 THE WITNESS: I don't know that answer. 6 BY MR. MUNSHI: 7 Q. Was there anybody else at CSC that 8 you're aware of who had similar roles and functions 9 as Ms. Liano? 10 A. I don't know that answer. 11 Q. Or a person who did what she did? 12 A. I don't know that answer. 13 Q. I believe you mentioned earlier that 14 your role as VP of HR was a global role; is that 15 right? 16 A. Yes, correct. 17 Q. And CSC had employees all over the 18 world; right? 19 A. Yes. 20 Q. Were individuals outside of North 21 America also affected by this delayering process? 22 A. Yes. 23 Q. And were individuals outside of North 24 America also -- were some individuals outside of 25 North America terminated as part of this delayering</p>	<p style="text-align: right;">104</p> <p>1 directly or indirectly to Mr. Roman? 2 MR. WOOD: Object to the form. Vague 3 as to time. 4 THE WITNESS: At any point in time? 5 BY MR. MUNSHI: 6 Q. Let's talk about a snapshot of middle 7 of 2012. 8 MR. WOOD: Object to the form. Vague 9 as to time. 10 THE WITNESS: I don't remember exact -- 11 BY MR. MUNSHI: 12 Q. Let me ask this question then. At any 13 point in the 2012 period, did the individuals 14 reporting to Mr. Roman change? 15 A. Yes. 16 Q. Okay. During the 2012 period, were 17 there any individuals who reported to Mr. Roman 18 directly or indirectly who were based outside of 19 North America? 20 A. I believe so. 21 Q. Were any of the individuals who 22 reported to Mr. Roman in the year 2012 who were 23 outside of North America affected by the delayering 24 process? 25 MR. WOOD: Object to the form. Vague.</p>

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<p style="text-align: right;">105</p> <p>1 THE WITNESS: Outside of the U.S., but</p> <p>2 reported directly to Mr. Roman affected by the</p> <p>3 delayering process?</p> <p>4 BY MR. MUNSHI:</p> <p>5 Q. Correct.</p> <p>6 A. Because of Mark Roman?</p> <p>7 Q. Just in Mark Roman's organizational</p> <p>8 structure.</p> <p>9 A. Well, Mark Roman's structure changed to</p> <p>10 where he didn't have global responsibilities; he</p> <p>11 had North American responsibilities. So those</p> <p>12 folks outside of his organization wouldn't have</p> <p>13 been -- those folks in Europe and the other places</p> <p>14 that he previously had wouldn't have been his</p> <p>15 direct reports anymore.</p> <p>16 Q. And when did that happen?</p> <p>17 A. With the -- I think the L3 layers, we</p> <p>18 brought a new layer in to Jim Cook's organization</p> <p>19 for healthcare, effectively moving everyone down a</p> <p>20 layer.</p> <p>21 Q. And did that happen before Ms. Liano</p> <p>22 was terminated or after?</p> <p>23 A. Before.</p> <p>24 Q. She was terminated December of 2012.</p> <p>25 Can you give me a ball park as to when this took</p>	<p style="text-align: right;">107</p> <p>1 MR. MUNSHI: Well, she just said she</p> <p>2 knows.</p> <p>3 BY MR. MUNSHI:</p> <p>4 Q. Was there any adverse impact analysis</p> <p>5 created in connection with the delayering process</p> <p>6 that resulted in Ms. Liano's termination?</p> <p>7 MR. WOOD: Object to the form.</p> <p>8 THE WITNESS: I'm not aware of one. HR</p> <p>9 did not perform one.</p> <p>10 BY MR. MUNSHI:</p> <p>11 Q. Do you know if anybody created one?</p> <p>12 A. I don't.</p> <p>13 Q. As an HR professional, within your</p> <p>14 capacity as an HR person, do you believe that</p> <p>15 that's a good idea for a company to create an</p> <p>16 adverse impact analysis to see if there are a</p> <p>17 disproportionate number of, let's say, older</p> <p>18 workers affected by a reduction in force?</p> <p>19 MR. WOOD: Objection to form. Vague,</p> <p>20 lack of foundation.</p> <p>21 THE WITNESS: I believe it's a standard</p> <p>22 best practice when you do any workforce reduction</p> <p>23 to do an adverse impact analysis, yes.</p> <p>24 BY MR. MUNSHI:</p> <p>25 Q. Okay. And does that apply to this</p>
<p style="text-align: right;">106</p> <p>1 place?</p> <p>2 A. Summer.</p> <p>3 Q. Of 2012?</p> <p>4 A. Yes, sir.</p> <p>5 Q. Okay. Do you know if any other</p> <p>6 individual who reported directly to Mr. Roman in</p> <p>7 the summer of 2012 was likewise a part of this</p> <p>8 delayering process besides Ms. Liano?</p> <p>9 MR. WOOD: Object to the form.</p> <p>10 THE WITNESS: I don't recall.</p> <p>11 BY MR. MUNSHI:</p> <p>12 Q. As part of the overall delayering</p> <p>13 process at CSC, were there any individuals who were</p> <p>14 located outside of North America terminated?</p> <p>15 A. Yes.</p> <p>16 Q. Was there any adverse impact analysis</p> <p>17 that was created at CSC?</p> <p>18 MR. WOOD: Object to the form.</p> <p>19 THE WITNESS: When?</p> <p>20 BY MR. MUNSHI:</p> <p>21 Q. Are you familiar with what an adverse</p> <p>22 impact analysis is?</p> <p>23 A. Yes.</p> <p>24 MR. WOOD: Object to the form. Lack of</p> <p>25 foundation.</p>	<p style="text-align: right;">108</p> <p>1 situation as well? Is it still standard for CSC --</p> <p>2 A. I'm not at CSC. I don't know.</p> <p>3 MR. WOOD: Object to the form. Vague.</p> <p>4 BY MR. MUNSHI:</p> <p>5 Q. Take me back to 2012.</p> <p>6 A. I'm sorry. Ask again.</p> <p>7 Q. Would it be standard HR best practices</p> <p>8 for CSC to do an adverse impact analysis in the</p> <p>9 year 2012 when they're doing a reduction in force?</p> <p>10 MR. WOOD: Object to the form.</p> <p>11 THE WITNESS: Not reductions in force</p> <p>12 associated with the delayering process.</p> <p>13 BY MR. MUNSHI:</p> <p>14 Q. Explain that to me. What do you mean</p> <p>15 by that?</p> <p>16 A. I mean that we didn't do, to my</p> <p>17 knowledge, any adverse impact analysis in the</p> <p>18 United States as part of the delayering process.</p> <p>19 Had we done a --</p> <p>20 Q. Why not?</p> <p>21 A. The decision was made by Mike Lawrie.</p> <p>22 I don't know why not.</p> <p>23 Q. The decision to not do an adverse</p> <p>24 impact analysis was made by Mike Lawrie?</p> <p>25 A. Somebody made that above my pay grade.</p>

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<p style="text-align: right;">109</p> <p>1 Q. Okay. Would you consider that to not 2 be best practices in this situation to not do an 3 adverse impact analysis? 4 A. Well, as I said a moment ago, as an HR 5 professional, I believe an adverse impact analysis 6 should be performed whenever you do a workforce 7 reduction. 8 Q. In connection with this layering 9 process that resulted in individuals losing their 10 jobs, was there ever any discussion about the 11 effect that this would have on the overall age of 12 the workforce at CSC? 13 MR. WOOD: Object to the form. 14 THE WITNESS: Not that I was a part of. 15 BY MR. MUNSHI: 16 Q. You mentioned earlier various 17 presentations, Power Point presentations or 18 documents that were created where age was one 19 metric included. After 2012, did you ever create 20 or see a similar document where age was a metric on 21 your presentation? 22 MR. WOOD: Object to the form. 23 THE WITNESS: It was a recurring part 24 of my metrics, yes. 25 BY MR. MUNSHI:</p>	<p style="text-align: right;">111</p> <p>1 often was it recurring? 2 A. Probably every year or so. 3 Q. As a result of any of the presentations 4 or documents that you gathered or presented where 5 age was a metric, were you ever given any sort of a 6 directive or a game plan as to what to do next with 7 that information? 8 MR. WOOD: Object to the form. 9 THE WITNESS: No. 10 MR. MUNSHI: Okay. Ms. Stafford, I 11 don't have any more questions for you this 12 afternoon. Thank you for being here. 13 THE WITNESS: Thank you. 14 MR. MUNSHI: And Mr. Wood has the 15 opportunity to ask any questions of you. 16 EXAMINATION 17 BY MR. WOOD: 18 Q. Ms. Stafford, you've been asked several 19 questions in the deposition today about 20 documentation, and counsel for Ms. Liano used the 21 term, quote, age as a metric, closed quote. Do you 22 recall those questions? 23 A. Yes. 24 Q. And I believe you testified that any 25 such information would have been presented in a</p>
<p style="text-align: right;">110</p> <p>1 Q. And prior to December of 2012, when you 2 did gather or present that data including age 3 metrics, was that for the entire CSC company or any 4 specific layer of CSC employee? 5 MR. WOOD: Object to the form. 6 THE WITNESS: It was for people in 7 the -- it was for people in BSS. 8 BY MR. MUNSHI: 9 Q. Okay. And that would include Mark 10 Roman and Linda Liano; correct? 11 MR. WOOD: Object to the form. 12 THE WITNESS: Yes. 13 BY MR. MUNSHI: 14 Q. Do you recall the last time you created 15 or presented that type of data metrics prior to 16 December of 2012? 17 A. I don't. 18 Q. Do you think it would have been within 19 that year or that decade? 20 MR. WOOD: Object to the form. Vague 21 and compound. 22 THE WITNESS: I believe it probably was 23 within that decade. 24 BY MR. MUNSHI: 25 Q. And when you said it was recurring, how</p>	<p style="text-align: right;">112</p> <p>1 meeting in which the topic of discussion included 2 protection of the company's intellectual property. 3 Is that right? 4 A. That's correct. 5 MUNSHI: Objection to form. Go ahead. 6 BY MR. WOOD: 7 Q. Was there any other context or subject 8 matter in which documentation concerning, quote, 9 age as a metric, closed quote, was presented or 10 discussed other than the context that you described 11 in terms of protection of intellectual property? 12 A. Not that I produced, no. 13 Q. And is there any other type of meeting 14 that you recall outside of that particular context 15 as you described it earlier in the deposition? 16 A. No. 17 Q. Do you know whether automation or 18 centralization were factors potentially involved in 19 eliminating a position such as an operations role 20 in an industry vertical? 21 MR. MUNSHI: Objection to form. Go 22 ahead. 23 THE WITNESS: We actually had several 24 criteria for all of the roles. Automation could 25 have been one. Centralizing, we centralized human</p>

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<p style="text-align: right;">113</p> <p>1 resources at this time. So centralization could be</p> <p>2 one. The financial results of an organization</p> <p>3 could be another. So all of those could have been</p> <p>4 factors.</p> <p>5 MR. WOOD: That's all I have.</p> <p>6 EXAMINATION</p> <p>7 BY MR. MUNSHI:</p> <p>8 Q. I just have a couple of follow-ups</p> <p>9 there. Ms. Stafford, with regard to age being a</p> <p>10 metric of discussion with regard to IP issues, the</p> <p>11 purpose of including age as a metric is that CSC</p> <p>12 had to keep track of who is going to retire;</p> <p>13 correct?</p> <p>14 MR. WOOD: Object to the form.</p> <p>15 THE WITNESS: Well, we couldn't predict</p> <p>16 when people were going to retire. But we certainly</p> <p>17 could think that it was upcoming for some people.</p> <p>18 So, yes, what we wanted to make sure that we could</p> <p>19 do is have a good transition plan for those folks</p> <p>20 if they announced that they were retiring, yes.</p> <p>21 BY MR. MUNSHI:</p> <p>22 Q. And in your experience at CSC,</p> <p>23 typically individuals who choose to retire tend to</p> <p>24 be close to what I'll call retirement age, in the</p> <p>25 60s of their life; correct?</p>	<p style="text-align: right;">115</p> <p>1 VIDEOGRAPHER: This concludes the video</p> <p>2 deposition of Debi Stafford. The time on the</p> <p>3 monitor is approximately 4:19 p.m., and we are now</p> <p>4 off the record.</p> <p>5 (The witness, after having been advised</p> <p>6 of her right to read and sign this transcript, does</p> <p>7 not waive that right.)</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>
<p style="text-align: right;">114</p> <p>1 MR. WOOD: Object to the form.</p> <p>2 THE WITNESS: Or older.</p> <p>3 BY MR. MUNSHI:</p> <p>4 Q. Or older; correct?</p> <p>5 A. Definitely.</p> <p>6 Q. And in those situations where there is</p> <p>7 somebody in their 60s or older who may be on the</p> <p>8 verge of retirement, CSC needs to ensure that that</p> <p>9 knowledge base is transferred to somebody who is</p> <p>10 still going to be at the company; right?</p> <p>11 MR. WOOD: Object to the form.</p> <p>12 THE WITNESS: Yes, that's true.</p> <p>13 BY MR. MUNSHI:</p> <p>14 Q. And typically those individuals who</p> <p>15 would be the recipients of that knowledge base</p> <p>16 would be younger; correct?</p> <p>17 MR. WOOD: Object to form. Lack of</p> <p>18 foundation.</p> <p>19 THE WITNESS: Practically speaking,</p> <p>20 yes.</p> <p>21 MR. MUNSHI: Okay. That's all I have.</p> <p>22 Thank you.</p> <p>23 THE WITNESS: Thank you.</p> <p>24 MR. WOOD: That's all I have. Thank</p> <p>25 you.</p>	<p style="text-align: right;">116</p> <p>1 SIGNATURE OF DEPONENT</p> <p>2 DEPONENT: DEBI STAFFORD</p> <p>3 DEPOSITION DATE: SEPTEMBER 19, 2017</p> <p>4 REPORTER: JANICE N. SHEPHERD</p> <p>5 CASE CAPTION: LINDA LIANO vs. COMPUTER SCIENCES</p> <p>6 CORPORATION</p> <p>7 (Please return both Signature of Deponent pages)</p> <p>8</p> <p>9 I, the undersigned, DEBI STAFFORD, do hereby</p> <p>10 certify that I have read the foregoing deposition</p> <p>11 and find it to be a true and accurate transcription</p> <p>12 of my testimony, with the following corrections, if</p> <p>13 any:</p> <p>14</p> <p>15 PAGE LINE CHANGE REASON</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>

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<p style="text-align: right;">117</p> <p>1 SIGNATURE OF DEPONENT (CONTINUED) 2 DEPOSITION DATE: SEPTEMBER 18, 2017 3 REPORTER: JANICE N. SHEPHERD 4 CASE CAPTION: LINDA LIANO vs. COMPUTER SCIENCES 5 CORPORATION 6 7 PAGE LINE CHANGE REASON 8 9 10 11 12 DEBI STAFFORD Date 13 I, Janice N. Shepherd, Notary Public for the 14 State of South Carolina at Large, do hereby certify 15 that the deponent was advised of his or her right 16 to read and sign said deposition both verbally and 17 in writing. If the deponent fails to execute and 18 return foregoing Signature of Deponent pages within 19 the thirty (30) days allowed pursuant to the Rules 20 of Civil Procedure, the original transcript may be 21 filed with the court. 22 23 Janice N. Shepherd, RPR, CSR 24 My Commission expires 25 October 10, 2024</p>	<p style="text-align: right;">119</p> <p>1 INDEX 2 3 4 DEBI STAFFORD Page Line 4 4 5 EXAMINATION 4 9 6 BY MR. MUNSHI 7 EXAMINATION 111 16 8 BY MR. WOOD 9 EXAMINATION 113 6 10 BY MR. MUNSHI 11 SIGNATURE OF DEPONENT 116 1 12 CERTIFICATE OF REPORTER 118 1 13 14 15 REQUESTED INFORMATION INDEX 16 17 (No Information Requested) 18 19 20 21 EXHIBITS 22 23 (No Exhibits Proffered) 24 25</p>
<p style="text-align: right;">118</p> <p>1 CERTIFICATE OF REPORTER 2 3 I, Janice N. Shepherd, Registered 4 Professional Reporter and Notary Public for the 5 State of South Carolina at Large, do hereby certify 6 that the foregoing transcript is a true, accurate, 7 and complete record. 8 I further certify that I am neither 9 related to nor counsel for any party to the cause 10 pending or interested in the events thereof. 11 Witness my hand, I have hereunto 12 affixed my official seal this 26th day of 13 September, 2017, at Charleston, Charleston County, 14 South Carolina. 15 16 17 18 19 20 21 22 23 24 Janice N. Shepherd, RPR, CSR 25 My Commission expires October 10, 2024</p>	

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